EXHIBIT B27

	Page 1
UNITED STATES DIS	TRICT COURT
DISTRICT OF NEW	JERSEY
x	
IN RE JOHNSON & JOHNSON) MDL No.
TALCUM POWDER PRODUCTS) 16-2738 (FLW)(LHG)
MARKETING SALES PRACTICES,)
AND PRODUCTS LIABILITY)
LITIGATION)
)
THIS DOCUMENT RELATES TO)
ALL CASES)
x	
VIDEOTAPED DEPOSI	TION OF
H. NADIA MOORE,	Ph.D.
WASHINGTON, D	.C.
THURSDAY, APRIL 4	, 2019
8:53 A.M.	
Reported by: Leslie A. Todd	

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1	Deposition of H. NADIA MOORE, Ph.D., held at	1	APPEARANCES (Continued):
2	the offices of:	2	
3		3	SUSAN M. SHARKO, ESQUIRE
4		4	DRINKER BIDDLE & REATH LLP
5	SKADDEN, ARPS, SLATE, MEAGHER &	5	600 Campus Drive
6	FLOM, LLP	6	Florham Park, New Jersey 07932-1047
7	1440 New York Avenue, N.W.	7	(973) 549-7000
8	Washington, DC 20005	8	
9	(202) 371-7000	9	GEOFFREY M. WYATT, ESQUIRE
10		10	SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP
11		11	1440 New York Avenue, N.W.
12		12	Washington, DC 20005
13		13	(202) 371-7000
14		14 15	ON DELIA LE QUE THE DCDC.
15 16		16	ON BEHALF OF THE PCPC: THOMAS T. LOCKE, ESQUIRE
17	Pursuant to notice, before Leslie Anne Todd,	17	SEYFARTH SHAW LLP
18	Court Reporter and Notary Public, who officiated	18	975 F Street, N.W.
19	in administering the oath to the witness.	19	Washington, D.C. 20004-1454
20	m administering the odul to the withess.	20	(202) 463-2400
21		21	(202) 100 2100
22		22	
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1	APPEARANCES	1	Page 5 APPEARANCES (Continued):
2	APPEARANCES	2	APPEARANCES (Continued):
2	APPEARANCES FOR THE PLAINTIFFS:	2	APPEARANCES (Continued): ON BEHALF OF PHARMATECH INDUSTRIES (PTI):
2 3 4	APPEARANCES FOR THE PLAINTIFFS: TED G. MEADOWS, ESQUIRE	2 3 4	APPEARANCES (Continued): ON BEHALF OF PHARMATECH INDUSTRIES (PTI): MATTHEW P. MORIARTY, ESQUIRE
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3 (Pages 6 to 9)

Page 10		Page 12
So I'll say that for the record, and	1	A I have.
then we can talk about it later.	2	Q Okay. How many times have you given a
MS. O'DELL: We can present this to	3	deposition?
if we can't reach an agreement, I'm hoping we can,	4	A Once.
because as you both know Mike and Susan knows	5	Q Okay. And I believe that's referenced
there was additional time for certain	6	in the materials that you've given to us?
plaintiffs' experts when there were analyses that	7	A It's yes.
were produced at the deposition. We're going to	8	Q The case that you were involved in?
take that position in this case.	9	A Yes.
	10	Q And have you ever testified in court
•	11	before?
	12	A Yes.
	13	Q How many times?
-	14	A Once.
	15	Q And was that the same case?
	16	A It was.
	17	Q Okay. We'll talk about that case a
		little bit later when we get to your materials.
		I'm sure your lawyers have told you that
_		I've got a lot probably have a number of
	1	questions to ask you today. I'll try to be as
	1	clear as I can. If you think I'm not clear,
	1	you're welcome to to tell me that you're not
-	1	understanding my question, and I'll do my best
	1	to to rephrase it for you.
This video deposition is being field at		to to repinate it for you.
Page 11		Page 13
Skadden, Arps at 1440 New York Avenue, Northwest,	1	I'll tell you up front, I have been
Washington, D.C., in the matter of In Re:	2	wrestling with a head cold for it seems like
Johnson & Johnson Talcum Powder Products,	3	for weeks, and these beautiful cherry blossoms in
Marketing, Sales Practices, and Products Liability	4	D.C., as much as I like looking at them, they may
Litigation, MDL No. 2738, pending before the	5	be messing with me a little bit as well. So as
United States District Court for the Eastern	6	the day goes on, I might be coughing, I might be
District of New Jersey.	7	clearing my throat, things like that, and I
Our deponent today is Dr. H. NADIA	8	apologize for that ahead of time.
MOORE.	9	Okay?
Counsel will be noted for appearances on	10	A Sure.
Counsel will be noted for appearances on the stenographic record.	10 11	A Sure.Q I guess the first thing I'd like to do
**		
the stenographic record.	11	Q I guess the first thing I'd like to do
the stenographic record. The court reporter is Leslie A. Todd,	11 12	Q I guess the first thing I'd like to do is get your your full name.
the stenographic record. The court reporter is Leslie A. Todd, who will now administer the oath.	11 12 13	Q I guess the first thing I'd like to do is get your your full name. A Hope Alexandria Moore. I go by H. NADIA
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the stenographic record. The court reporter is Leslie A. Todd, who will now administer the oath. H. NADIA MOORE, Ph.D., and having been first duly sworn,	11 12 13 14 15	Q I guess the first thing I'd like to do is get your your full name. A Hope Alexandria Moore. I go by H. NADIA MOORE. Q Okay. And where do you live? A I live in Washington state.
the stenographic record. The court reporter is Leslie A. Todd, who will now administer the oath. H. NADIA MOORE, Ph.D., and having been first duly sworn, was examined and testified as follows:	11 12 13 14 15 16	Q I guess the first thing I'd like to do is get your your full name. A Hope Alexandria Moore. I go by H. NADIA MOORE. Q Okay. And where do you live? A I live in Washington state.
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	So I'll say that for the record, and then we can talk about it later. MS. O'DELL: We can present this to if we can't reach an agreement, I'm hoping we can, because as you both know Mike and Susan knows there was additional time for certain plaintiffs' experts when there were analyses that were produced at the deposition. We're going to take that position in this case. And the instances you're talking about were a couple of articles, and certainly not multi-page analyses that had not previously been provided. MS. SHARKO: We disagree. We will oppose vigorously any effort for you to get more time. I submit that there's not all that much new stuff in there. MS. O'DELL: Well, we will present it to Judge Pisano and let him decide. THE VIDEOGRAPHER: We are now on the record. My name is Daniel Holmstock. I'm the videographer for Golkow Litigation Services. Today's date is April 4th, 2019, and the time on the video screen is 8:56 a.m. This video deposition is being held at Page 11 Skadden, Arps at 1440 New York Avenue, Northwest, Washington, D.C., in the matter of In Re: Johnson & Johnson Talcum Powder Products, Marketing, Sales Practices, and Products Liability Litigation, MDL No. 2738, pending before the United States District Court for the Eastern District of New Jersey. Our deponent today is Dr. H. NADIA MOORE.	So I'll say that for the record, and then we can talk about it later. MS. O'DELL: We can present this to if we can't reach an agreement, I'm hoping we can, because as you both know Mike and Susan knows there was additional time for certain plaintiffs' experts when there were analyses that were produced at the deposition. We're going to take that position in this case. And the instances you're talking about were a couple of articles, and certainly not multi-page analyses that had not previously been provided. MS. SHARKO: We disagree. We will oppose vigorously any effort for you to get more time. I submit that there's not all that much new stuff in there. MS. O'DELL: Well, we will present it to Judge Pisano and let him decide. THE VIDEOGRAPHER: We are now on the record. My name is Daniel Holmstock. I'm the videographer for Golkow Litigation Services. Today's date is April 4th, 2019, and the time on the video screen is 8:56 a.m. This video deposition is being held at Page 11 Skadden, Arps at 1440 New York Avenue, Northwest, Washington, D.C., in the matter of In Re: Johnson & Johnson Talcum Powder Products, Marketing, Sales Practices, and Products Liability Litigation, MDL No. 2738, pending before the United States District Court for the Eastern District of New Jersey. Our deponent today is Dr. H. NADIA

	Page 14		Page 16
1	(Moore Exhibit No. 1 was marked	1	this is this is my opinion.
2	for identification.)	2	Q Okay.
3	BY MR. MEADOWS:	3	A These represent my opinions.
4	Q I've marked as Exhibit 1 what is	4	Q All right. And the opinions that you've
5	identified as well, your Rule 26 report,	5	expressed in this report that we've marked as
6	Dr. Moore.	6	Exhibit 1, you've also referenced either in the
7	Do you recognize that?	7	report or in an attachment to the report marked
8	A I do.	8	as
9	Q Okay. And that's your signature on the	9	MR. MEADOWS: References, I don't see it
10	front?	10	on here. Okay. Excuse me.
11	A It is.	11	BY MR. MEADOWS:
12	Q Okay. And this was apparently signed by	12	Q On page 5 of your report
13	you, if we look at the first page. It appears it	13	A Yes.
14	was signed by you on March 25th of this year,	14	Q you have a list of and it's
15	correct?	15	paragraph D there, a list of materials received
16	A No. Sorry, you said March.	16	for review. Do you see what I'm talking about?
17	Q Excuse me. February 25th of this year.	17	A Correct.
18	A Correct.	18	Q And are those the materials that you
19	MR. ZELLERS: That was a test.	19	reviewed in order to reach the opinions you have
20	MR. MEADOWS: Yeah, an inadvertent one.	20	in this case?
21	BY MR. MEADOWS:	21	A So these were the materials that I
22	Q Okay. And so this report reflects your	22	received from the attorneys in this case.
23	opinions in this case; is that correct?	23	Q Okay. Does that represent all of the
24	A Yes, it does.	24	materials that you reviewed in order to reach the
25	Q And is it a complete recitation of your	25	opinions expressed in this report?
	Q 7 and is it a complete rectation of your	23	opinions expressed in this report.
	Page 15		Page 17
1	opinions in this case?	1	A No.
2	MR. ZELLERS: Objection. Form.	2	Q Okay. Well, where would I find the a
3	THE WITNESS: So it's the opinions that	3	reference to the materials that any additional
4	I had when I wrote the report, yes.	4	materials you reviewed in order to reach your
5	BY MR. MEADOWS:	5	opinions in this case?
6	Q Okay. Do you have new opinions?	6	A So the the the references that are
7	A Not that I know of, no.	7	cited in the footnotes in the report were used to
8	Q Okay. Well, if you do, I need to know	8	reach my opinions in this case, as well as there's
9	about it, so	9	a I apologize, I don't know the exact name of
10	A Yes.	10	the supplemental list that was distributed.
11	Q So my question is, does this report	11	Q Okay. So you're you just refer
12	represent the the whole of your opinions in	12	referenced a supplemental list. Is that the list
13	this case?	13	that was provided to us last night?
14	MR. ZELLERS: Object to form.	14	A I'm not sure. I believe it is.
15	THE WITNESS: Well, it represents	15	Q Okay. So last night I received or
16	everything that that I know that everything	16	Ms. O'Dell, my law partner, received an e-mail
17	that I understood to be the scientific matter, and	17	from Katherine McBeth at 5:57 p.m
18	what you may ask me today may change my opinions.	18	MS. O'DELL: Central Time.
19	BY MR. MEADOWS:	19	BY MR. MEADOWS:
20	Q Okay. You're saying that if I present	20	Q Central Time that attaches I tell
21	you with some evidence today that suggests that	21	you what, let's mark this.
22	your opinions are incorrect, that you're willing	22	(Mr. Meadows and Ms. Tucker conferring.)
23	to change your opinions?	23	(Moore Exhibit No. 2 was marked
1	A Well, I think in general as a scientist,	24	for identification.)
24			
	to change your opinions?	23	(Moore Exhibit No. 2 was ma

5 (Pages 14 to 17)

	Page 18		Page 20
1	Q All right. So that's Exhibit 2 that	1	MR. ZELLERS: Well
2	I've marked.	2	THE WITNESS: I mean, or do they need to
3	MR. ZELLERS: Mr. Meadows, Exhibit 2 is	3	stay in order?
4	the cover cover e-mail, and then with the	4	MR. ZELLERS: There should be a cover
5	attachments. Is that	5	page to that.
6	MR. MEADOWS: Correct. That's what we	6	THE WITNESS: Yeah. So this document,
7	received last night.	7	it looks like maybe 20 pages in.
8	MR. ZELLERS: And there were a number of	8	MR. ZELLERS: You tell us the title.
9	attachments, I guess six attachments?	9	THE WITNESS: Sure. It's a "Complete
10	MR. MEADOWS: There were a lot.	10	List of Materials Reviewed and Considered by
11	MR. ZELLERS: Okay.	11	H. Nadia Moore, PhD, DABT, ERT, as of April 3rd,
12	BY MR. MEADOWS:	12	2019."
13	Q So you're Dr. Moore, are you familiar	13	BY MR. MEADOWS:
14	with the materials I just handed to you?	14	Q Okay. And how can I tell which ones you
15	A (Peruses document.)	15	reviewed before you wrote the report dated
16	MR. ZELLERS: And before she responds, I	16	February 25th of 2019?
17	don't think she's familiar with the cover letter,	17	A So the ones that are marked with an
18	but she can answer as to everything else.	18	asterisk, the asterisk is defined on each page as
19	MR. MEADOWS: You're referring to the	19	"Reviewed after February 25th report issued."
20	cover e-mail?	20	Q Where am I going to find this asterisk?
21	MR. ZELLERS: Yeah, the cover e-mail.	21	Is it going to be on the left or the right of
22	MR. MEADOWS: Okay.	22	each
23	THE WITNESS: So I didn't go through	23	A It's after each one. So if you the
24	obviously every page, but I am it seems like	24	easiest example is to go to the end of the
25	I'm familiar with the materials minus the cover	25	document on page 21, and there's the expert
	Page 19		Page 21
1	e-mail.	1	reports that were received in this matter that I
2	BY MR. MEADOWS:	2	received after I issued my report, and they all
3			
	Q Okay. And so you're you're saying	3	have asterisks on the back. I think if you print
4	that those materials that are found in Exhibit 2,	3 4	have asterisks on the back. I think if you print this in color, the asterisks are actually like a
4 5	that those materials that are found in Exhibit 2, with the exception of the the cover e-mail, are		have asterisks on the back. I think if you print this in color, the asterisks are actually like a reddish color so they'll stand out.
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	Page 22		Page 24
1	each entry you have here, can you tell me which	1	THE WITNESS: So I think I said that I
2	ones you read in total?	2	had reviewed the materials at the time of the
3	A So I think we'd have to go through each	3	report. So I I guess I don't understand your
4	one, and I can look at it and give you my opinion.	4	question.
5	Q With respect to those materials, did	5	BY MR. MEADOWS:
6	you have you at any point in time since you	6	Q Yeah, and I I'm not understanding
7	signed your report read the the entire	7	what you did and didn't do as of the time you
8	reference material?	8	signed your report and what you've done since.
9	MR. ZELLERS: Objection. Form.	9	A Okay. As of the time I signed my
10	THE WITNESS: I don't understand the	10	report, I reviewed the references that did not
11	question.	11	have a star. Since then I've gone back and
12	BY MR. MEADOWS:	12	reviewed some references that I had already
13	Q Okay. Well, you you've I'm under	13	reviewed.
14	the impression that there are certain items in	14	Q Okay. So you've gone back and reviewed
15	here that you have read and studied thoroughly and	15	some references that you had already reviewed.
16	others that you have not.	16	Now, that that throws me off.
17	So my question is, can you tell me	17	A I don't understand why.
18	well, have you since the signing of your report	18	Q Okay. Well, what prompted you to review
19	gone back and read in total everything that you're	19	these these new materials that we were provided
20	now telling us that is a reference material?	20	with last night?
21	MR. ZELLERS: Objection. Form.	21	A So I didn't review there's very few
22	THE WITNESS: So, again, I just I	22	new materials on my list.
23	don't understand the question.	23	Q Okay. That's not my question. There
24	BY MR. MEADOWS:	24	are some new materials on your on your list you
25	Q Okay. Let me ask you this: Did this	25	gave us last night, right?
	Q Okay. Let like ask you tills. Did tills		gave as tast night, right.
	Page 23		Page 25
1	list that you provided yesterday to us, did it	1	A What
2	exist as of the date you signed this report on	2	Q I mean you've identified them
3	February 25th, 2019?	3	A what is the definition of new, I
4	A The list as it as it is written?	4	guess?
5	Q Did it exist in any form?	5	Q Well, the ones that have an asterisk
6	A Well, I guess I what do you mean "in	6	next to them.
7	any form"? It's a list of materials that I	7	A Okay.
8	reviewed, so	8	Q Okay. What prompted you to consider
9	Q Okay. But my question is I'm having	9	those materials since you since you wrote this
10	a hard time understanding what you have reviewed	10	report in February?
11	before you signed your report and what you	11	MR. ZELLERS: Well, and let me just
12	reviewed since. Can you explain that to me?	12	instruct you not to get into any discussions
13	A So	13	between the attorneys and yourself, but with that
14	MR. ZELLERS: Go ahead.	14	caveat, please answer Mr. Meadows' question.
15	THE WITNESS: So the materials that I	15	THE WITNESS: Okay. I want to refresh
16	reviewed before my report are the ones without an	16	myself with the question.
17	asterisk on this list.	17	Okay. So the question was what prompted
18	BY MR. MEADOWS:	18	me to consider those materials since you wrote the
19	Q Okay. And so did this list even	19	report, and most of the materials that were newly
20	though you may not have reviewed the materials as	20	considered were expert reports that were written
21	of the time you signed the report, did the list in	21	in this matter.
22	some way, shape or form exist at the time you	22	BY MR. MEADOWS:
23	signed the report?	23	Q I understand that.
24	MR. ZELLERS: Objection. Misstates her	24	My question is, what prompted you to
25	testimony.	25	to read those since you wrote wrote your
			to read those since you wrote wrote your

report? A I wanted to understand what the other experts were what their opinions were.	1 2	Q Dr. Moore, let me just ask youA Sure.
A I wanted to understand what the other		
experts were what their opinions were.		
	3	Q without looking, can you tell me
Q Okay. What prompted you to want to	4	whether or not there's medical literature on this
to know what these other experts were saying?	5	list that's marked with an asterisk?
	6	A So how
	7	Q I'm not asking him. I'm asking you
discussions between counsel and the witness. If	8	A Sorry, I didn't want to cut him off.
she can answer that question without that, please	9	Q can you tell me without looking at
	10	that list whether there's medical literature
THE WITNESS: So I don't know how to	11	that's marked with an asterisk on that list?
answer that, I guess. Is that so I mean the	12	MR. ZELLERS: Objection. Form.
	13	THE WITNESS: So how would you define
	14	"medical literature"?
		BY MR. MEADOWS:
		Q How do you define "medical literature"
read it?		as a professional?
		A I'm just asking so I'm accurate in
		response.
		Q Okay. Well, you tell me how you would
• • • •		define it.
•		A Something that relates I mean it's
		very vague in general. Right? So I would say
	1	almost all of this literature is medical, so I was
		trying to understand what what asterisk you
		trying to understand what what disterisk you
Page 27		Page 29
MR. ZELLERS: And I believe that gets	1	were
into discussions between counsel and the the	2	Q Okay. So my question is, can you tell
witness.	3	me, without looking, whether there's any asterisks
Can you add anything more to your	4	next to medical literature on that list?
previous answer?	5	MR. ZELLERS: Objection. Form. It's
THE WITNESS: I think I've already	6	not a memory test.
answered the question.	7	THE WITNESS: So there are asterisks on
BY MR. MEADOWS:	8	this list that's related to publications from
Q Now, so far you've kind of answered	9	PubMed.
these questions as if this is all about reports	10	BY MR. MEADOWS:
generated in this litigation, but it's not just	11	Q Okay.
reports generated in this litigation that you've	12	A That's
read since you signed your report on	13	Q And what prompted you to look at that
February 25th, 2019, right?	14	those materials?
A Correct.	15	MR. ZELLERS: Same instruction, not to
Q I mean, there there are there's	16	identify communications with counsel.
medical literature in here, right?	17	BY MR. MEADOWS:
A Well, you have to show me which one.	18	Q And I'm not asking you what lawyers
Q I don't. I'm just asking you, is there	19	said
medical literature that you marked with an	20	A So
asterisk?	21	Q or what you said to lawyers.
	I .	The state of the s
	22	I'm asking you, what prompted you to
MR. ZELLERS: So take your time and look	22 23	I'm asking you, what prompted you to look at that at that medical literature that's
		I'm asking you, what prompted you to look at that at that medical literature that's marked with an asterisk?
_	MR. ZELLERS: And again, I'm going to instruct the witness not to get into any discussions between counsel and the witness. If she can answer that question without that, please go ahead. THE WITNESS: So I don't know how to answer that, I guess. Is that so I mean the reports were supplied to me by the attorneys in this matter. BY MR. MEADOWS: Q Okay. So the lawyers prompted you to read it? MR. ZELLERS: Objection. I misstates her testimony, but I don't want her and I will tell you, please, don't get into conversations between counsel and yourself. BY MR. MEADOWS: Q I'm not asking you what the lawyers said. I'm just asking you what prompted you to read this material. Page 27 MR. ZELLERS: And I believe that gets into discussions between counsel and the the witness. Can you add anything more to your previous answer? THE WITNESS: I think I've already answered the question. BY MR. MEADOWS: Q Now, so far you've kind of answered these questions as if this is all about reports generated in this litigation, but it's not just reports generated in this litigation, but it's not just reports generated in this litigation that you've read since you signed your report on February 25th, 2019, right? A Correct. Q I mean, there there are there's medical literature in here, right? A Well, you have to show me which one. Q I don't. I'm just asking you, is there	MR. ZELLERS: And again, I'm going to instruct the witness not to get into any discussions between counsel and the witness. If she can answer that question without that, please go ahead. THE WITNESS: So I don't know how to answer that, I guess. Is that so I mean the reports were supplied to me by the attorneys in this matter. BY MR. MEADOWS: Q Okay. So the lawyers prompted you to read it? MR. ZELLERS: Objection. I misstates her testimony, but I don't want her and I will tell you, please, don't get into conversations between counsel and yourself. BY MR. MEADOWS: Q I'm not asking you what the lawyers said. I'm just asking you what prompted you to read this material. Page 27 MR. ZELLERS: And I believe that gets into discussions between counsel and the the witness. Can you add anything more to your previous answer? THE WITNESS: I think I've already answered the question. BY MR. MEADOWS: Q Now, so far you've kind of answered these questions as if this is all about reports generated in this litigation, but it's not just reports generated in this litigation, but it's not just reports generated in this litigation that you've read since you signed your report on February 25th, 2019, right? A Correct. Q I mean, there there are there's medical literature in here, right? A Well, you have to show me which one. Q I don't. I'm just asking you, is there

8 (Pages 26 to 29)

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	Page 30		Page 32
1	medical literature, but I can tell you that a lot	1	A Correct.
2	of what I did was based on reviewing some of the	2	Q Okay. So
3	depositions in this matter and understanding what	3	A I just thought you meant in litigation
4	was what discussions were being engaged.	4	in general.
5	Q And when did that list come into	5	Q I mean this case that you wrote a report
6	existence?	6	for on February 25th, 2019.
7	MR. ZELLERS: Foundation. She may not	7	A So she's been helping me since the
8	know.	8	beginning.
9	But when did you first see this list?	9	Q Since the beginning. And when was the
10	Is that fair? Or or	10	beginning?
11	MR. MEADOWS: Sure.	11	A I think the attorneys first contacted me
12	BY MR. MEADOWS:	12	the end of November.
13	Q When did you first see that list?	13	Q And what attorneys contacted you?
14	A So in its entirety or as a draft?	14	A Ms. Curry.
15	Q As we're looking at it here. I mean,	15	Q Ms. Curry?
16	I we've looked at it several times now.	16	A Mm-hmm.
17	A Right.	17	Q Of and this was the end of November
18	Q When did this come into existence? When	18	of 2018?
19	did you first see it?	19	A Of 2018.
20	A So so we finished this list	20	Q Who is Ms. Curry?
21	yesterday.	21	A She is the attorney that's involved in
22	Q Okay. When you say "we," who are you	22	this litigation.
23	talking about?	23	Q Okay. Did you know Ms. Curry before she
24	A So I started the list, my office helped	24	reached out to you?
25	me prepare it, and then the attorneys also helped	25	A I did not.
	Page 31		Page 33
1	put some of the reports and depositions into it.	1	Q Had you had any involvement in the
2	Q Okay. So tell me who at your office	2	this the subject matter that is involved in
3	participated and which of the lawyers participated	3	this litigation before Ms. Curry reached out to
4	in creating this list.	4	you?
5	MR. ZELLERS: And foundation as to the	5	A I did.
6	lawyers.	6	Q Tell me about that.
7	But go ahead.	7	A So I had given a presentation at the
8	THE WITNESS: So myself and Jennifer	8	at an ACI conference in the summer of 2017.
9	Hobden at my office.	9	Q And so we'll talk about that a little
10	BY MR. MEADOWS:	10	bit more in a little bit.
11	Q Okay. Who is Jennifer Hobden?	11	I think you actually provided us with
12	A She is a toxicologist at Veritox.	12	your PowerPoint slides from that conference; is
13	Q How do you spell her last name?	13	that correct?
14	A H-O-B-D-E-N.	14	A Correct.
15	Q Okay. And you said she is a	15	Q And before you presented at that
16	toxicologist at Veritox?	16	conference in the summer of 2017, had you been
17	A Correct.	17	involved at all in the subject matter that is the
18	Q And how long has she been working there?	18	basis of this litigation?
	A Longer than I have.	19	A So I had obviously done research for
	-	20	that presentation but had not been involved in the
19	O And how involved has she been in in		-
19 20	Q And how involved has she been in in this litigation?	21	litigation
19 20 21	this litigation?	21	litigation. O You had done research for the
19 20 21 22	this litigation? A I don't understand the question.	22	Q You had done research for the
19 20 21 22 23	this litigation? A I don't understand the question. What define "this litigation."	22 23	Q You had done research for the presentation.
19 20 21 22	this litigation? A I don't understand the question.	22	Q You had done research for the

2 any r	resentation, had you been involved in doing	1	litigation?
2 any r			miguion.
3 the b	esearch in in the subject matter that is	2	A So there's been other people that have
	asis of this litigation?	3	been involved. Those are the main people that I
4 A	Beyond reading the occasional article,	4	can recall right now.
5 no.		5	Q All right. What lawyers were involved
6 Ç	And what would have prompted you to read	6	in helping you put this list together?
7 the o	ecasional article?	7	MR. ZELLERS: Foundation objection.
8 A	Just as part of my general scientific	8	If you know.
9 readi	=	9	THE WITNESS: So I worked with I
	Okay. Now, going back to those who	10	think a paralegal in putting this together.
	ed you in coming up with this list that	11	BY MR. MEADOWS:
	been talking about. Jennifer Hobden at	12	Q A paralegal.
	ox was involved, right?	13	A Yeah.
	Correct.	14	Q And what was her what was his or her
15 Ç		15	name?
	No. I don't believe so.	16	A Tara, and I'm blanking on the last name.
17 Q		17	Q Okay. So no lawyers worked directly
	ved beyond the preparation of this list? And	18	with you to compile this list?
	n has anybody else at Veritox been involved	19	A Well, there was a lawyer obviously
	n helping you understand the literature,	20	involved with Tara. I don't know what her
	legwork for you to to gather materials,	21	involvement was with the list.
-	any involvement by anyone else at Veritox	22	Q What was her what was her name?
	as helped you prepare for this your	23	A Jessica Miller.
-	cipation in this litigation?	24	Q And once this list was well, let me
25 A	Yes, I have had some staff members help	25	ask you this: Was let me make sure I get this
	Page 35		Page 37
1 me.		1	correct here.
2 Ç	Okay. And who who are they?	2	So this list originated at with you
3 A	So Lara, L-A-R-A, Diener, D-I-E-N-E-R.	3	at Veritox, or did it originate with the lawyers
4 Brian	na Bennett.	4	that are involved in this case?
5 Ç	Okay.	5	A It originated with me.
6 A	And Rebecca Ticknor, T-I-C-K-N-O-R.	6	Q And so did you write out handwrite
7 Ç		7	out a list or type a list that you gave to the
8 A	Those probably, but those are the	8	lawyers?
	people.	9	A No. I typed out this list that I
	And what have they done to assist?	10	Q You typed out this list that I have in
	They helped me do literature searches	11	front of me right
	o compile references, and that type of thing.	12	A Very similar to that list, a first
	Okay. And Jennifer Hobden, is is she	13	draft.
14 a Ph.		14	Q So you typed out a draft, and then you
	No.	15	submitted it to the lawyers.
	Okay. Is she the only non-staff member	16	A Correct.
	s assisted you in this regard at Veritox?	17	Q And then the lawyers added some more
	Sorry, I didn't understand.	18	materials to the list.
	Yeah. So far you've given me four	19	A So I had discussions with the
20 name	s, Jennifer Hobden, Lara I think Diener,	20	attorney with Tara, and whether or not we were
	(phonetic)	21	going to add all the expert reports or not, and
	Dealet	22	she said she had a list, and so she just cut and
22 A	Right.		_
22 A 23 Q	Brianna Bennett, Rebecca Ticknor.	23	pasted that list, the reports that I had received.
22 A 23 Q 24 Are t	=		_

Page 38 Page 40 1 list and those that the lawyers put on? 1 that you have expressed in your report? 2 A The lawyers put on the ones that the --2 MR. ZELLERS: Objection. Form. 3 the expert reports and -- and depositions. 3 THE WITNESS: So it's hard for me to put 4 Q Okay. Did the lawyers add any of the 4 an importance asterisk on each reference. My 5 medical literature that we found on there that has 5 report has references in it that I selected to 6 6 an asterisk on it? include. These are all the references that I 7 7 MR. ZELLERS: Objection. Form. considered in making my report. 8 Okay. I do not want you to get into any 8 BY MR. MEADOWS: 9 discussions with lawyers. 9 Q Okay. And my question is, how did you 10 10 go about deciding what you were going to put on So I think that calls for a privileged 11 11 communication as to what her discussions with the 12 A So these were the references that I had 12 lawyers were. MR. MEADOWS: Okay. Well --13 reviewed when I -- when I wrote the report. 13 14 14 MR. ZELLERS: I mean she's answered your Q I understand. Why did you decide to 15 15 review those and how did you make the decision question. I've let her go in terms of answering 16 that that was going to be the materials that you 16 the question, but I'm going to instruct her not to 17 would review in order to render your opinions in 17 answer that question. 18 this case? 18 MR. MEADOWS: Well, I'm trying to find 19 MR. ZELLERS: Objection. Form, vague. 19 out what she considered important in reviewing, 20 20 THE WITNESS: So, my job, as I saw it -and I'm not -- unless she can give me her list 21 my task was to evaluate the scientific literature 21 that she created that she gave to the lawyers, I 22 that was related to this issue. As part of that, 22 have no way of knowing which ones she thought were 23 23 I identified a lot of articles that I considered important and which ones the lawyers thought were 24 as part of my opinion, and that's what's reflected 24 important. 25 25 in this. MR. ZELLERS: Well, she has said the Page 39 Page 41 1 lawyers added the depositions, but I am sure she 1 BY MR. MEADOWS: 2 can go through this list and identify for you each 2 Q Okay. My question is, how did you go 3 of the references, whether it came from her office 3 about identifying them? 4 or not. 4 A So that was done through searching, 5 5 BY MR. MEADOWS: PubMed searching as well as Google searching, 6 Q Do you still have the list that you gave 6 evaluating articles that came from those searches, 7 7 the lawyers? and then looking at those references of those 8 A I don't know. 8 articles, pulling another iteration of that. So I 9 Q Okay. If you do, will you give it to 9 would pull more references, I would consider the 10 us? 10 references, and then I would evaluate the MR. ZELLERS: Okay. Objection. I'll --11 11 citations in those references and get another 12 you know, you can make whatever request you want 12 round of references. of counsel, and we will respond. 13 13 Q How did you decide what -- I assume that 14 Well, yes, I mean I do believe it would 14 you used search terms in order to decide what the 15 15 be a privileged draft because this is part of her universe was of documents you were going to or report, and the rule's clear on that. 16 16 references you were going to look at. Is that a 17 BY MR. MEADOWS: 17 fair assumption? 18 Q So how -- with respect to the entire 18 A Yes, I used search terms. 19 19 list, not just the ones that -- that have Q What type search terms did you use? 20 asterisks next to them but all of them, how were 20 A A used a variety of search terms. 21 21 those references identified? "Ovary" -- probably "ovary and talc," "talc and 22 A So -- oh, how did I go back and generate 22 ovarian cancer," "talc and cancer," as well as 23 the list? Is that what you're asking me? 23 searching for cobalt, chromium, nickel, the 24 Q Well, I mean, were -- are all of these 24 fragrance ingredients, and probably others that I 25 25 materials important to you in -- in the opinions can't think of today right at this moment, but if

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1	I look through my report, I can probably come up	1	were the expert reports in this matter that didn't
2	with more terms if you'd like.	2	become available until after I signed my report.
3	Q Well, do you have notes somewhere that	3	Q What about the medical literature?
4	you that would reflect the search terms that	4	MR. ZELLERS: Okay. Take a look,
5	you used?	5	please, at your list, and then I don't know
6	A I do not.	6	that the two of you have identified medical
7	Q Who came up with the search terms? You?	7	literature.
8	A I I did.	8	BY MR. MEADOWS:
9	Q Can you characterize as you sit there	9	Q Dr. Moore, can you tell me whether any
10	today how much of the materials referenced in this	10	of the medical literature that is on that list
11	list, what percentage of them are new?	11	came into existence in the last 30 days?
12	A I haven't gone back to look at that	12	MR. ZELLERS: Objection. Form.
13	at the percentage. I'd say a very small	13	Don't guess.
14	percentage of the scientific articles are new.	14	THE WITNESS: I I
15	Q When you say "very small," you mean,	15	BY MR. MEADOWS:
16	what, 10 percent?	16	Q I'm I mean
17	MR. ZELLERS: Please do the calculation.	17	A Right.
18	Look at the page and give Mr. Meadows your	18	Q you are a professional, right?
19	THE WITNESS: Okay. Can I borrow your	19	A I am.
20	pen?	20	Q Okay. You're a toxicologist, right?
21	BY MR. MEADOWS:	21	A That's correct.
22	Q Well, let me	22	Q I'm to call you doctor, right?
23	A I was	23	A Please.
24	Q let me ask you this: What is if	24	Q Okay. And medical literature is the
25	somebody told you that it was at least 25	25	foundation upon which you operate every day,
	Page 43		Page 45
1	percent of it was new, would you disagree with	1	right?
2	that?	2	MR. ZELLERS: Objection.
3	MR. ZELLERS: Objection. Calls for	3	BY MR. MEADOWS:
4	speculation.	4	Q I mean you medical literature is
5	THE WITNESS: I haven't evaluated that	5	something you look at every day in your career,
6	as far as numbers. I would have to go back and	6	right?
7	look.	7	A I look at research literature.
8	BY MR. MEADOWS:	8	Q Okay. Can you tell me sitting there
9	Q Okay.	9	today, is there any anything new that has come
10	A (Peruses document.)	10	out in the last 30 days that is on on this
11	Q So will you agree that the new materials	11	list?
12	that you have provided on this list, all those	12	MR. ZELLERS: Take your time and
13	materials were available to you at the time you	13	don't guess and look.
14	wrote your original report in February of 2019,	14	BY MR. MEADOWS:
15	weren't they?	15	Q I'm asking you to go based on your
16	MR. ZELLERS: Objection. Form.	16	recollection, Dr. Moore.
17	Misstates the evidence.	17	A Well, I I understand what you're
18	THE WITNESS: No.	18	asking me.
19	BY MR. MEADOWS:	19	Q I mean, if there was literature that
20	Q No?	20	came out on this on this topic in the last 30
21	A No, I don't believe so.	21	to 45 days, it would be important, wouldn't it?
	Q So some of that medical literature and	22	MR. ZELLERS: Objection. Form,
22			
23	some of those reports only came into existence in	23	foundation.
	some of those reports only came into existence in the last month? A So a lot of the materials I reviewed	23 24 25	foundation. BY MR. MEADOWS: Q Would it be important?

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1	A I would have to evaluate that	1	material.
2	literature.	2	BY MR. MEADOWS:
3	Q Okay. And if it's on this list, then it	3	Q Well, the stuff that's got an asterisk
4	really is important, right?	4	next to it were reviewed after February 25th was
5	MR. ZELLERS: Objection. Form.	5	submitted after the February 25th report was
6	THE WITNESS: So this list is just the	6	submitted, right?
7	materials that I considered in this matter.	7	We established that the stuff that's
8	BY MR. MEADOWS:	8	marked with an asterisk was reviewed after you
9	Q Right. And it's import the list	9	wrote your report that was submitted on
10	that is reflected here, it was important enough	10	February 25th of 2019, right?
11	for you to put on a list that you had considered	11	A The materials with an asterisk were
12	it, right?	12	considered by me after I wrote the report.
13	MR. LOCKE: Objection.	13	Q Right. Did any of those materials
14	MR. ZELLERS: Objection. Form, vague.	14	change your opinions in this case?
15	THE WITNESS: So what was the question	15	A No.
16	again? Sorry.	16	Q I want to go back to your original or
17	BY MR. MEADOWS:	17	your report that we were looking at as Exhibit 1,
18	Q Listen, all I'm asking you is, did any	18	and I want to go to your CV.
19	medical literature, did any studies come out in	19	Now, I think I haven't looked at
20	the last 30 to 45 days that you put on this list?	20	it at them closely, but I think that last night
21	I'm asking you based on your recollection, is	21	we were provided if my recollection is correct,
22	there anything that was important enough that came	22	and you please correct me if I'm wrong but I
23	out in the last 30 to 45 days that you considered	23	think we were provided with a CV last night as
24	and put on this list?	24	well, were we not?
25	MR. ZELLERS: Objection. Argumentative.	25	MR. ZELLERS: It's right after the list
	Page 47		Page 49
1	THE WITNESS: So I	1	of references.
2	MR. ZELLERS: Go ahead.	2	THE WITNESS: Oh. Yes, I found it.
3	THE WITNESS: So I read a lot of	3	BY MR. MEADOWS:
4	literature every day, and so it's hard for me to	4	Q Okay. So I'm just I'm trying to
5	disseminate what happened in the last 30 to 45	5	figure out why we got this last night because I
6	days with all of the literature that I reviewed.	6	it it appears to be I mean, just in page
7	This is a long list, and I'd like to look through	7	length maybe it's different. Am I missing
8	it and I'll let me look through it for a minute	8	something here?
9	and I'll let you know.	9	MR. ZELLERS: I'm
10	BY MR. MEADOWS:	10	MR. MEADOWS: I'm just trying to
11	Q Now, I was just asking based on your	11	reconcile what the difference is between the two
12	recollection. I mean you can look at it on your	12	CVs. I mean, and
13	own time. I was asking based on your	13	MR. ZELLERS: I let's ask the witness
14	recollection. Obviously you don't recall, right?	14	here.
15	MR. ZELLERS: Objection. Misstates the	15	MS. SHARKO: You did ask for it.
16	evidence.	16	MR. ZELLERS: Right.
17	THE WITNESS: That's not what I said at	17	THE WITNESS: So I don't see a
18	all.	18	difference.
19	BY MR. MEADOWS:	19	BY MR. MEADOWS:
20	Q Let me ask you this: Did any of this	20	Q No? Okay.
21	new material that was provided last night, has any	21	Well, the reason that I ask is because
	of it changed your opinions in this case at all?	22	it appears that the one that you gave us that was
22			
	MR. ZELLERS: Objection. Misstates her	23	attached to your report back in February appears
22		23 24	attached to your report back in February appears to be six pages long, and the one that you gave us

i	Page 50		Page 52
1	got it's in a different part here. Okay. All	1	Are you familiar with Alfred Wiener?
2	right. So they seem to have the same number of	2	A I've seen his name.
3	pages.	3	Q Okay. Did you ever meet Dr. Wiener?
4	Can you can you tell me, to satisfy	4	A I did not.
5	my curiosity, are they the same? Has your CV	5	Q Was he working there at Battelle while
6	changed at all	6	you were working there?
7	A No, I don't	7	A I don't know.
8	Q since you submitted your report?	8	Q Don't know. Have you ever had any
9	A believe so, no.	9	communications with Dr. Wiener?
10	Q Okay. All right. So let's look at your	10	A No.
11	CV for just a minute. It was attached to your	11	Q And then it looks like you continued
12	report, correct?	12	working at Battelle as a principal research
13	A Yes.	13	scientist first and a senior research scientist
14	Q Okay. All right. So we see here you	14	thereafter.
15	have a Ph.D. in toxicology, right?	15	And then you went to work at the
16	A Yes.	16	University of Washington no, actually, I guess
17	Q And you got your Ph.D. in 2008, right?	17	you were a student at the University of Washington
18	A Correct.	18	for five years; is that correct?
19	Q That's when people started calling you	19	A I was a student and a research
20	doctor. Is that fair enough?	20	associate.
21	A Fair.	21	Q Okay. All right. And while you were
22	Q Okay. Before that, you had a BS in	22	there, did you continue working at Battelle?
23	chemistry, right?	23	A I I had a leave of absence at
24	A Yes.	24	Battelle.
25	Q Okay. Going on down, it looks like	25	Q Okay. And so how did that work when
	Danie 51		D 52
_	Page 51		Page 53
1	you're a member of the American Board of	1	you because it looks like you went back to work
2	Toxicology, right?	2	at Battelle after you left the University of
3	A Correct.	3	Washington, right?
4	Q Okay. You're a member of a couple of	4	A I did.
5	other groups, right?	5	Q Did you work at Battelle at all while
6	A The groups that are listed there.		
I –		6	you were at the University of Washington?
7	Q Yeah. Now, going down to your	7	you were at the University of Washington? A I was an hourly employee.
8	Q Yeah. Now, going down to your experience, I want to kind of work our way through	7 8	you were at the University of Washington? A I was an hourly employee. Q And so how did tell me about that.
8 9	Q Yeah. Now, going down to your experience, I want to kind of work our way through that chronologically, if I can. It looks like in	7 8 9	you were at the University of Washington? A I was an hourly employee. Q And so how did tell me about that. How did you end up going from Battelle to the
8 9 10	Q Yeah. Now, going down to your experience, I want to kind of work our way through that chronologically, if I can. It looks like in 1992 you went to work for Battelle; is that right?	7 8 9 10	you were at the University of Washington? A I was an hourly employee. Q And so how did tell me about that. How did you end up going from Battelle to the University of Washington, continuing to work
8 9 10 11	Q Yeah. Now, going down to your experience, I want to kind of work our way through that chronologically, if I can. It looks like in 1992 you went to work for Battelle; is that right? A Yes.	7 8 9 10 11	you were at the University of Washington? A I was an hourly employee. Q And so how did tell me about that. How did you end up going from Battelle to the University of Washington, continuing to work there? What prompted you to do that and and
8 9 10 11 12	Q Yeah. Now, going down to your experience, I want to kind of work our way through that chronologically, if I can. It looks like in 1992 you went to work for Battelle; is that right? A Yes. Q And tell tell us what Battelle is.	7 8 9 10 11 12	you were at the University of Washington? A I was an hourly employee. Q And so how did tell me about that. How did you end up going from Battelle to the University of Washington, continuing to work there? What prompted you to do that and and how did all that work?
8 9 10 11 12 13	Q Yeah. Now, going down to your experience, I want to kind of work our way through that chronologically, if I can. It looks like in 1992 you went to work for Battelle; is that right? A Yes. Q And tell tell us what Battelle is. A Battelle is a research institute, a	7 8 9 10 11 12 13	you were at the University of Washington? A I was an hourly employee. Q And so how did tell me about that. How did you end up going from Battelle to the University of Washington, continuing to work there? What prompted you to do that and and how did all that work? A So when I was at Battelle, some of the
8 9 10 11 12 13 14	Q Yeah. Now, going down to your experience, I want to kind of work our way through that chronologically, if I can. It looks like in 1992 you went to work for Battelle; is that right? A Yes. Q And tell tell us what Battelle is. A Battelle is a research institute, a nonprofit institute that does a variety of	7 8 9 10 11 12 13 14	you were at the University of Washington? A I was an hourly employee. Q And so how did tell me about that. How did you end up going from Battelle to the University of Washington, continuing to work there? What prompted you to do that and and how did all that work? A So when I was at Battelle, some of the senior scientists encouraged me to go back to get
8 9 10 11 12 13 14 15	Q Yeah. Now, going down to your experience, I want to kind of work our way through that chronologically, if I can. It looks like in 1992 you went to work for Battelle; is that right? A Yes. Q And tell tell us what Battelle is. A Battelle is a research institute, a nonprofit institute that does a variety of research projects and operates different	7 8 9 10 11 12 13 14	you were at the University of Washington? A I was an hourly employee. Q And so how did tell me about that. How did you end up going from Battelle to the University of Washington, continuing to work there? What prompted you to do that and and how did all that work? A So when I was at Battelle, some of the senior scientists encouraged me to go back to get a graduate degree, and so that's that's what
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1 2 3 4 5	you had with Battelle was they would assist you in financially in going to school and but	1 2	A No.
3 4		2	0 4 1 1 1 1 1 1 1 1 1
4			Q And did was your work exclusively
	you had promised that you would come back?	3	inhalation exposure or did you also work on other
5	A Correct.	4	types of exposures?
J	Q Okay. And who were the senior	5	MR. ZELLERS: Objection. Misstates her
6	scientists that encouraged you to to do that?	6	testimony. Are you talking about her initial
7	A Terry Mast.	7	work?
8	Q Terry Mast?	8	MR. MEADOWS: Yeah, I guess well,
9	A Mm-hmm.	9	during this time period, if that's what your issue
10	Q Anybody else?	10	is. I'm trying I'm trying to figure out what
11	A And my manager, Gordon Billard.	11	type of exposure issues she worked on in her lead
12	Q Anybody else?	12	up to going to University of Washington.
13	A Probably those are the two that stand	13	THE WITNESS: So at Battelle Toxicology
14	out.	14	Northwest, we primarily did inhalation work, and
15	Q Okay. And so what were you working on	15	then when I was at the National Lab, we did a
16	at Battelle in the years leading up to your	16	variety of risk assessments for different routes
17	departure to go to University of Washington? What	17	of exposure, cumulative exposures.
18	type of projects did you work on?	18	BY MR. MEADOWS:
19	MR. ZELLERS: Can you answer that	19	Q And did you do any work on perineal
20	generally?	20	exposures?
21	THE WITNESS: Yeah.	21	A Not specifically, but in a whole body
22	MR. ZELLERS: Okay. Go ahead.	22	chamber, the entire animal is exposed.
23	THE WITNESS: So generally, toxicology	23	Q Okay. But you didn't do any specific
24	projects, risk assessment projects.	24	work pertaining to perineal exposures?
25	BY MR. MEADOWS:	25	A That's correct.
	Page 55		Page 57
1	Q Okay. And can you tell me well, can	1	Q Have you ever done any work pertaining
2	you tell me, were there specific areas of research	2	to perineal or that is specific to perineal
3	or issues that you were assigned to during that	3	exposures?
4	time period?	4	MR. ZELLERS: Objection. "Work" is
5	A So while I was at Battelle Toxicology	5	vague.
6	Northwest, most of that was inhalation toxicology	6	But go ahead.
7	work, but not all. And then when I was at the	7	THE WITNESS: So do you mean laboratory-
8	then when I transferred to the National	8	based research?
9	Laboratory, a lot of that work was more general	9	BY MR. MEADOWS:
10	risk assessment as well as inhalation.	10	Q I mean any type of of research.
11	Q Okay. And were there specific	11	Have you ever done any type of research
12	inhalation issues that you were working on?	12	that is specific to perineal exposures?
13	A It depended on the project.	13	A So I've evaluated this dataset that was
14	Q Okay. And I guess that's what I'm	14	specific for perineal exposures.
15	asking, what what were those projects?	15	Q Okay. When when you say "this
16	A So part of the work was done for	16	dataset," you're talking about the work that you
17	commercial entities, and a lot of that is	17	did that's reflected in your expert report in this
18	confidential matters, but pharmaceuticals, drugs.	18	case.
19	And then the other part of the business was	19	A That's correct.
20	working for the National Toxicology Program,	20	Q So before you did the expert report in
21	running a lot of inhalation experiments that went	21	this case or the preparation for the expert report
	through the National Toxicology Program, and then	22	in this case, you had never done any work that's
22		I .	
	other projects as well.	23	specific to perineal exposures?
22	other projects as well. Q Did any of those projects have to do	23 24	specific to perineal exposures? MR. ZELLERS: Objection. Misstates her

	Page 58	Page 60
1	but	1 THE WITNESS: So they didn't encourage
2	BY MR. MEADOWS:	2 me to pursue any certain discipline besides
3	Q You can answer.	3 toxicology. So that to me inferred that they did
4	MR. ZELLERS: Well	4 not have a specific project other than a
5	THE WITNESS: So	5 toxicology-related field.
6	BY MR. MEADOWS:	6 BY MR. MEADOWS:
7	Q Are you going to tell me about that	7 Q And I mean on that topic, I mean,
8	stuff in 2017 now?	8 you toxicology is your area of expertise,
9	MR. ZELLERS: She's already told you. I	9 correct?
10	mean you asked.	10 A Correct.
11	MR. MEADOWS: Well, I she can answer	Q Okay. All right. So after working
12	it.	at after finishing your education at University
13		
	MR. ZELLERS: All right. I will let	
14	her.	
15	THE WITNESS: All right. So apart from	
16	reviewing	
17	MR. MEADOWS: Thank you.	A So say that sorry, so so that
18	THE WITNESS: the literature	was the intent. But that's not what happened.
19	associated with perineal exposure to talc, I have	Q What happened?
20	not done.	A I should clarify. So that was the
21	BY MR. MEADOWS:	intent. That was the agreement that was made with
22	Q So when you when you made the	the National Lab, and then when I finished school,
23	arrangement with Battelle to go to school and then	the National Lab actually didn't have funding for
24	come back, was were there specific projects	a position.
25	that Battelle was hoping that you would come back	And so Toxicology Northwest is actually
	Page 59	Page 61
1	and participate in or was this just a general	a different group of people, and they had an
2	arrangement?	opening for a toxicologist. So so then I went
3	MR. ZELLERS: Foundation. Objection.	to Toxicology Northwest without any obligations at
4	THE WITNESS: I don't know what the	4 all.
5	management at Battelle was thinking.	5 Q Okay. So Battelle Toxicology Northwest
6	BY MR. MEADOWS:	is different from Battelle Pacific Northwest, is
7	Q Well, I guess to the extent that you	that
8		8 A So it's it's all under the global
9	A To the extent that I knew, you can't predict what the work is going to be like in five	9 Battelle organization, and then Battelle also runs
10	years.	independent national labs. So the National Lab is
11	Q Did you have a feel a feeling that	its own entity that's operated by Battelle, and
12	there were going to be certain projects they would	then Battelle Toxicology Northwest is an
13	want you to work on when you came back?	organization that's run directly under Battelle
14	MR. ZELLERS: Objection. Form. Vague.	
	· ·	Memorial Institute. So it's a different at the end, there's one manage there's one CEO, but
15 16	THE WITNESS: That would be that	
16 17	would be speculation, I guess. But	·
17	MR. ZELLERS: Go ahead, answer.	BY MR. MEADOWS:
18	THE WITNESS: I can guess that	Q All right. So you worked there for
19	MR. ZELLERS: No, don't guess, please.	roughly five years?
20	BY MR. MEADOWS:	20 A Yes.
21	Q And my ask my question was simply,	Q And then you went to work for Veritox,
22	did you have a feeling for the type of work you	which is where you work now, right?
~~	at that at the second second	
23	thought that they would want you to work on when	A Correct.
24	you come came back?	Q And what type of work have you done at

	Page 62		Page 64
1	A Primarily risk assessment and risk	1	BY MR. MEADOWS:
2	communication, toxicology assessments, safety	2	Q Now, in this instance, you are you've
3	assessments, those type of projects.	3	been hired to be an expert witness in this case,
4	Q Okay. And I assume Veritox well,	4	correct?
5	what does Veritox do generally?	5	A Correct.
6	A So they're an environmental health	6	Q And I'll assume that you are charging
7	consulting company that consults in toxicology-	7	Johnson & Johnson to testify in this case, right?
8	related issues, environmental sorry,	8	MR. ZELLERS: Objection. Form.
9	environmental hygiene issues. There's also a	9	THE WITNESS: So we we bill the hours
10	component that's represented by engineering staff,	10	that are done to to counsel for Johnson &
11	and so it's called GT Engineering, they do	11	Johnson. I'm not sure where our bills go, but
12	business as GT Engineering, and they do failure	12	BY MR. MEADOWS:
13	analyses type work.	13	
14	Q I assume that Veritox works for		Q How did you go about landing this
15	companies; is that correct?	14 15	business with Johnson & Johnson to work on this
16	A They they do work for a lot of		case?
17		16	MR. ZELLERS: Objection. Form.
18	organizations.	17	THE WITNESS: I I guess I I don't
19	Q How does Veritox make money, I guess is	18	know the answer to that. I mean, I received a
	the question?	19	call from Ms. Curry in this matter.
20	A Pardon?	20	BY MR. MEADOWS:
21	Q How does Veritox make money?	21	Q Well, did you reach out to Johnson &
22	A Oh. They do work.	22	Johnson and tell them that you could provide
23	Q Okay. For whom?	23	services for them?
24	A For people who come to us.	24	A No.
25	Q And those people are generally	25	Q Did you reach out to any lawyers and
	Page 63		Page 65
	· · · · · · · · · · · · · · · · · · ·		rage 05
1	corporations?	1	tell them that you could provide services for
1 2		1 2	
	corporations?		tell them that you could provide services for
2	corporations? A I I don't know what the breakdown is.	2	tell them that you could provide services for them?
2 3	corporations? A I I don't know what the breakdown is. There's there's certainly companies, school	2 3	tell them that you could provide services for them? A No.
2 3 4	corporations? A I I don't know what the breakdown is. There's there's certainly companies, school districts, fire departments, a variety of different entities.	2 3 4	tell them that you could provide services for them? A No. Q Ms. Curry just called you out of the
2 3 4 5	corporations? A I I don't know what the breakdown is. There's there's certainly companies, school districts, fire departments, a variety of	2 3 4 5	tell them that you could provide services for them? A No. Q Ms. Curry just called you out of the blue one day?
2 3 4 5 6	corporations? A I I don't know what the breakdown is. There's there's certainly companies, school districts, fire departments, a variety of different entities. Q As a part of your work, are you are	2 3 4 5 6	tell them that you could provide services for them? A No. Q Ms. Curry just called you out of the blue one day? A I received a phone call from Ms. Curry.
2 3 4 5 6 7	corporations? A I I don't know what the breakdown is. There's there's certainly companies, school districts, fire departments, a variety of different entities. Q As a part of your work, are you are you obliged to generate clientele for Veritox?	2 3 4 5 6 7	tell them that you could provide services for them? A No. Q Ms. Curry just called you out of the blue one day? A I received a phone call from Ms. Curry. Q Now, in addition to your work as in
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	Page 66		Page 68
1	A So there's a company that I work with	1	And actually as I'm making my objection,
2	that makes food food additives. Another	2	you know, I believe that she was retained as a
3	let's see I'm trying to think.	3	consultant, you know, on a separate project, and
4	So a pharmaceutical company, some	4	so I'm going to instruct her not to answer further
5	chemical companies. I'm trying to think. In	5	than she has.
6	general terms maybe I could probably come up	6	BY MR. MEADOWS:
7	with some later just in general.	7	Q Have you done any other work for J&J?
8	Q Well, let me get more specific then.	8	A No.
9	Have you ever done any work for Johnson & Johnson	9	Q Are you aware of whether Veritox has
10	before?	10	done any other work for J&J?
11	A I had.	11	A They have.
12	Q Okay. Can you tell me about those	12	Q Can you tell me about that?
13	projects?	13	A Generally.
14	A Generally.	14	Q Go ahead.
15	Q Go ahead.	15	A It's work that Dr. Bryan Hardin has
16	A So I was asked to look at some of the	16	done.
17	scientific data regarding toxicology of asbestos	17	Q Did it pertain to baby powder or talcum
18	and cleavage fragments.	18	powder?
19	Q And when was that?	19	MR. ZELLERS: If you know.
20	A It began probably December-ish 2017.	20	THE WITNESS: I I don't know for
21	Q And is that I have a note here, and	21	sure, but I believe it did.
22	my notes are not always right, but I have a note	22	BY MR. MEADOWS:
23	here that you Ms. Curry reached out to you at	23	Q And do you know when that work started?
24	the end of November of 2018, right? Or yeah.	24	A No.
25	A Yes.	25	Q Has Veritox done any work for Imerys?
			Q 1140 (411011 4011 411) ((011 101 11141) (
	Page 67		Page 69
1	Q Okay. So you're saying that you	1	A I don't know.
2	actually had done some work for J&J approximately	2	Q Have you ever done any work for Imerys?
3	a year earlier.	3	A No.
4	A Well, that was the date that they	4	Q Has Veritox or you ever done any work
5	contacted me.	5	for PCPC?
6	Q And was this pertaining to baby powder?	6	A I don't know what that is.
7	A It was just toxicology of cleavage	7	Q Okay. PCPC is the Personal Care
8	fragments in general.	8	Products Council, also formally known as the
0			Troducts Council, wise formarily into the distinct
9	Q In general. So it wasn't in the context	9	Cosmetic Toiletries Fragrance Association.
10	Q In general. So it wasn't in the context of talcum powder or baby powder.	9 10	,
	, ,		Cosmetic Toiletries Fragrance Association.
10	of talcum powder or baby powder.	10	Cosmetic Toiletries Fragrance Association. A I mean, I've heard of that, but
10 11	of talcum powder or baby powder. A It probably was. Just my my	10 11	Cosmetic Toiletries Fragrance Association. A I mean, I've heard of that, but Q Yeah, that one's memorable, isn't it?
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	Page 70		Page 72
1	matter.	1	can answer it "yes" or "no."
2	Q Okay. Well, now, was that work that you	2	MR. ZELLERS: Okay. I'm going to
3	did in December of 2017 for J&J related to the	3	instruct her not to answer. Our position is, is
4	work that you have done here that's now the	4	that that was a consulting assignment that she did
5	subject of your report?	5	that was unrelated to the work that she's doing
6	MR. ZELLERS: Okay. I'll let her answer	6	here. So, I mean, I think you've
7	that question, but but not go further.	7	MR. MEADOWS: I hear that is your
8	THE WITNESS: So I guess	8	position, but that's not what I heard is her
9	MR. ZELLERS: Do you understand the	9	position. She's not sure whether or not it was
10	question?	10	related to the work she did in this case.
11	THE WITNESS: Not really. Well, so I	11	MR. ZELLERS: I thought she answered
12	didn't really understand the question, and then	12	MR. MEADOWS: She can't she had a
13	the time and the time frame. So	13	hard time separating it out is what I heard.
14	BY MR. MEADOWS:	14	MR. ZELLERS: Well, I mean, I believe
15	Q Okay. I believe you told me earlier	15	she's answered your question on that. So do you
16	that you did some work for J&J starting around	16	have a new question?
17	December of 2017 that pertained to asbestos and	17	BY MR. MEADOWS:
18	cleavage fragments.	18	Q Any of the materials that you reviewed
19	Do you remember talking about that	19	for your project in December of 2017, are they
20	earlier?	20	included in the materials that you've provided to
21	A I do.	21	us in this case as being ones that you've relied
22	Q Okay. So my question is, did you	22	on?
23	generate a report that pertained to that that	23	MR. ZELLERS: Objection. Form,
24	work?	24	foundation.
25	A To the work that was started in December	25	THE WITNESS: So again, I can't I
	Page 71		Page 73
1	of	l ,	
	01	1	can't answer "yes" or "no" because I'm there's
2	Q Correct.	2	can't answer "yes" or "no" because I'm there's probably articles that were read in that matter
2			
	Q Correct.	2	probably articles that were read in that matter
3	Q Correct.A 2017. So there was no report on the	2	probably articles that were read in that matter that are also pertinent to this matter, but
3 4	Q Correct. A 2017. So there was no report on the asbestos and cleavage fragment literature review	2 3 4	probably articles that were read in that matter that are also pertinent to this matter, but without evaluating each article, I can't say
3 4 5	Q Correct. A 2017. So there was no report on the asbestos and cleavage fragment literature review that I did.	2 3 4 5	probably articles that were read in that matter that are also pertinent to this matter, but without evaluating each article, I can't say whether, yes or no, it applied to both or one.
3 4 5 6	Q Correct. A 2017. So there was no report on the asbestos and cleavage fragment literature review that I did. Q Okay. And then as a follow-up, did that work have anything to do with or result in	2 3 4 5 6	probably articles that were read in that matter that are also pertinent to this matter, but without evaluating each article, I can't say whether, yes or no, it applied to both or one. BY MR. MEADOWS:
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3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q Correct. A 2017. So there was no report on the asbestos and cleavage fragment literature review that I did. Q Okay. And then as a follow-up, did that work have anything to do with or result in information that you considered in in generating the report that you've done in this case? MR. ZELLERS: Objection. Vague, ambiguous. THE WITNESS: So I don't think I can answer that with any certainty. And so there's articles that I read there that you know, I don't know which articles I read for that that may also pertain to the matter that that we're discussing today. BY MR. MEADOWS: Q Did you reach any conclusions or opinions as a result of the work that you did in	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	probably articles that were read in that matter that are also pertinent to this matter, but without evaluating each article, I can't say whether, yes or no, it applied to both or one. BY MR. MEADOWS: Q So that project started in December of 2017, you had said, or thereabouts? A That's when the first contact was made. I don't remember when it actually started. Q And specifically I'm talking about the the work pertaining to the asbestos and cleavage fragments. A Okay. Q Okay. So how long did that project go on? A It was ongoing. Q Till when? A I'd say it's still I haven't done we haven't closed that project, but I haven't done any work on it in quite a while. Q I assume you billed J&J for that work?
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1	2017 and the one that's the the report that you	1	did, you tell me. Okay?
2	generated in this case?	2	A Okay. So I think we can clarify that
3	A No.	3	that I did do perineal work regarding this case,
4	Q Can you clarify that for me? Who who	4	but
5	reached out to you for the 2017 project?	5	Q But I'm talking about before this
6	A It was Jonathan Cooper.	6	case
7	Q Okay. And is Jonathan Cooper with J&J	7	A Okay.
8	or is he a lawyer?	8	Q you you told me that you had never
9	A He's a lawyer.	9	done any work that's specific to perineal
10	Q Who's he with?	10	exposure, correct?
11	A Tucker Ellis, I believe.	11	MR. ZELLERS: Same objection.
12	Q And then the report you did in this	12	BY MR. MEADOWS:
13	case, that was your initial contact came from	13	Q Is that what you told me earlier?
14	Ms. Curry; is that right?	14	A So no studies that had the the
15	A That's correct.	15	purpose stated was a perineal exposure.
16	Q And who's she with?	16	Q Tell me what work you have done that is
17	A I'm not sure. I haven't had a lot of	17	specific to perineal exposure.
18	contact with her.	18	A So perineal exposure would occur in a
19	Q What's her first name?	19	whole body chamber.
20	A I met her, but I can't remember. I'm	20	Q That's not specifically perineal
21	sorry.	21	exposure, is it? That's whole body exposure,
22	Q Jennifer Curry, does that ring a bell?	22	right?
23	No?	23	A That's correct, but the perineal
24	MS. SHARKO: Do you want to know the	24	exposure also occurs.
25	name?	25	Q All right. So ovarian cancer, have you
	Page 75		Page 77
1	MR. MEADOWS: The law firm sure. Put	1	ever done any work pertaining to ovarian cancer
2	you under oath.	2	before you got involved in this case?
3	MS. SHARKO: Well, you're not going to	3	A So I have done carcinogenicity studies
4	put me under oath.	4	for the National Toxicology Program, which
5	MR. MEADOWS: No?	5	evaluates all organs, including ovarian tissues.
6	MS. SHARKO: Although that might be fun.	6	Q Okay. Tell me what work you've done
7	MR. MEADOWS: That would be fun.	7	that's been specific to ovarian cancer.
8	MS. SHARKO: But her name is Dawn Curry.	8	A So I just said I've done whole body
9	MR. MEADOWS: Thank you.	9	or carcinogenicity studies in rodents that
10	THE WITNESS: Thank you.	10	evaluate ovarian tissue and carcinogenicity.
11	BY MR. MEADOWS:	11	Q Are you an expert on ovarian cancer?
12	Q All right. So a couple of things I	12	MR. ZELLERS: Objection. Form.
13	wanted to ask you about. Ovarian cancer	13	THE WITNESS: So I'm a toxicologist, and
14	experience, have you ever I know we talked	14	I've studied carcinogenesis.
15	earlier about perineal exposure, and I think you	15	BY MR. MEADOWS:
16	told me that you hadn't done any work on anything	16	Q Are you telling me you're an expert on
17	specific to perineal exposure.	17	all types of cancers?
	What about ovarian cancer, have you ever	18	A I no, I'm not saying that. What I'm
18		1	saying is I'm a toxicologist, and we evaluate
18 19	done any work that's specific to ovarian cancer	19	
	until you got involved in this case?	19 20	carcinogenicity endpoints.
19		1	
19 20	until you got involved in this case?	20	carcinogenicity endpoints. Q So are you an expert on ovarian cancer? MR. ZELLERS: Objection. Form.
19 20 21	until you got involved in this case? MR. ZELLERS: Okay. Objection.	20 21	carcinogenicity endpoints. Q So are you an expert on ovarian cancer?
19 20 21 22	until you got involved in this case? MR. ZELLERS: Okay. Objection. Misstates the evidence.	20 21 22	carcinogenicity endpoints. Q So are you an expert on ovarian cancer? MR. ZELLERS: Objection. Form.

	Page 78		Page 80
1	endpoints.	1	said. I believe that I worked on that list with
2	BY MR. MEADOWS:	2	Jen Hobden. I generated the list.
3	Q All right. What cancers are you an	3	Q Okay. And when did the question is,
4	expert on?	4	when did you give it to the lawyers?
5	A So I guess you need to define what you	5	A So it was an iterative process.
6	mean by "expert" in cancer.	6	Q It was a what?
7	Q Well, what do you think an expert would	7	A Iterative. So many times going back and
8	be?	8	forth.
9	A Well, so I've	9	Q Okay. When was it finished as far as
10	MR. ZELLERS: Go ahead.	10	your part that you gave to the lawyers?
11	THE WITNESS: So I evaluate test	11	A So I I don't I don't speciate
12	chemicals and their propensity to cause cancer.	12	between it was always my list.
13	That's as an expert, that's what I do.	13	Q Well, that's okay. I'm assuming
14	BY MR. MEADOWS:	14	that's the case. So but your the part
15	Q All right. But work that was specific	15	you told me earlier that there were some things
16	to ovarian cancer, you've not done that, right?	16	that you put on the list and there were some
17	MR. ZELLERS: Objection. Form.	17	things that the lawyers put on the list, right?
18	THE WITNESS: Again, carcino in	18	A Yes.
19	general, carcinogenicity studies that I that	19	Q So the part that you did, that you were
20	I'm involved in don't specifically call out	20	finished with, when did you give that to the
21	a priori the tissue that's going to be evaluated.	21	lawyers?
22	We evaluate all tissue.	22	A So there were I went through early on
23	BY MR. MEADOWS:	23	weeks ago and put together the list, the majority
24	Q Mm-hmm. What work have you done or	24	of it, and then as I received more materials, we
25	have you done any work that's specific to	25	added that to that list.
	Page 79		Page 81
1	mesothelioma?	1	Q So this effort started when?
2	A So, again, that would be the same	2	A Well, the effort started in in
3	answer.	3	December of 2018 with this writing of my report.
4	Q So any cancer I were to name today, you	4	Q Well, now, I'm referring to the the
5	would say that you have expertise in it.	5	part of the list that's new that had an asterisk
6	A In as far as the endpoint.	6	next to it that you didn't include with your
7	Q There's not a cancer that I could throw	7	report that you generated back in February.
8	out there that you wouldn't say, I'm an expert on	8	So when did when did you start
9	that?	9	creating that list?
10	MR. ZELLERS: Objection. Form.	10	MR. ZELLERS: The list of new materials?
11	THE WITNESS: I don't know.	11	MR. MEADOWS: Correct.
12	BY MR. MEADOWS:	12	THE WITNESS: The list of new materials
13	Q You don't know. Okay.	13	began shortly after I issued my report.
14	I think you provided us with some	14	BY MR. MEADOWS:
15	MR. MEADOWS: I'm not sure what I did	15	Q And you were providing that to the
16	here. Should I get okay.	16	lawyers on an ongoing basis?
17	MR. ZELLERS: And just as you're	17	MR. ZELLERS: I'm going to instruct her
18	looking, it was counsel that provided you with	18	not to answer more about the communications back
19	materials last night, so	19	and forth with the lawyers.
20	BY MR. MEADOWS:	20	BY MR. MEADOWS:
	Q By the way, when did the list that you	21	Q Okay. I need to go back to your CV for
21		22	the moment.
22	and Ms. Diener and Ms. Bennett and Ms. Ticknor		
22 23	the list that y'all came up that you gave to the	23	And I want to flip over to the section
22			

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1	A Yes, I do.	1	saying.
2	Q So the title leaves me wondering if	2	Q Okay. Was any of it mentioned on your
3	there are others. Are there other publications	3	CV?
4	that were not selected?	4	A So that wouldn't be I am not listed
5	A There may have been some from the '90s,	5	as an author on those publications.
6	you know.	6	Q Is there anything that you have here
7	Q So this is not a complete list of your	7	today that you could look at to tell us what data
8	publications?	8	has been published on those NTP studies you were
9	A I would have to go back and check.	9	involved in?
10	If what what you call publications, there may	10	A So the data itself is I'd have to
11	have been some abstracts in the '90s dealing with	11	look on the NTP website to see which studies may
12	analytical chemistry work.	12	have been published through the NTP, and I
13	Q What are you going to have to do to go	13	don't and then I'd have to figure out from
14	check on that?	14	there if they've been published by the NTP whether
15	A I don't know. I'd have to go back and	15	or not they have been submitted those results
16	see if because this is my my CV. I yeah,	16	to the peer-reviewed literature.
17	I don't know how I would find that information	17	Q So it's something that you could figure
18	right now.	18	out.
19	Q If you flip over to page 4, you see that	19	A Yes.
20	word again "Selected Continuing Education."	20	Q Okay. All right. So where were we?
21	A Right.	21	THE WITNESS: Could we take a break at
22	Q So this is not a complete list, is it?	22	some point?
23	A So again, there may have been some	23	MR. MEADOWS: Yep, sure, that's fine
24	courses that I didn't put on there, you know, an	24	with me, if your if your lawyer's okay with it.
25	hour or two here. This is the pertinent	25	MR. ZELLERS: It's up to you. You're
	•		
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1	continuing education as as it applies to my CV.	1	the questioner.
2	Q And what would you need to do to go	2	MR. MEADOWS: Am I in complete control?
3	figure out how to make this list complete?	3	Did I just give it all to me?
4	MR. ZELLERS: Objection. Form.	4	THE VIDEOGRAPHER: The time is
5	THE WITNESS: I would call this a	5	10:28 a.m., and we're going off the record.
6	complete list. These are the ones that I there	6	(Recess.)
7	may have been a class that I went to that	7	THE VIDEOGRAPHER: The time is
8	that's not on there, so I added the word	8	10:40 a.m., and we're back on the record.
9	"selected."	9	BY MR. MEADOWS:
10	BY MR. MEADOWS:	10	Q All right. Dr. Moore, what did you do
11	Q Earlier you mentioned some NTP studies	11	to prepare for your deposition?
12	that you were involved in. Did I hear that	12	A I reviewed my report, looked at some
13	correctly?	13	and looked at some articles. Also I read through
14	A Yes.	14	some depositions.
15	Q Okay. And can you tell me, has the data	15	Q Okay. And what articles did you look
16	from those studies been published?	16	at?
17	A Some have through the NTP website. I	17	A Various ones.
18	don't know about the peer-reviewed literature.	18	Q Okay. Which ones?
19	Q Can you tell me about that?	19	A Well, I'd have to I'd have to go
20	A Vaguely.	20	through my report and point them out.
21	Q Vaguely?	21	Q Go right ahead.
22	A Vaguely. Just from memory, I don't	22	A Okay. (Peruses document.)
23	Q Go ahead.	23	I think I probably concentrated I'm
24	A I'd have I'd have to go back and	24	just going to let's see. So I looked through
ī		l	
25	look, because I want to be accurate about what I'm	25	IARC, Volume 93.

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1	Some of the case-control and cohort	1	today, right?
2	studies. I don't recall exactly which ones I	2	Q Well, I mean specifically getting ready
3	reviewed. Wu I know I reviewed one of the Wu	3	to sit there and give testimony today, when did
4	studies, maybe both. Cramer, some of the studies	4	that process start?
5	that were published by Cramer.	5	A Well, I guess when I started reviewing
6	Penninkilampi, Gertig, the Gates	6	the data for this project.
7	studies, Claughton, Gonzales.	7	Q Have you met with lawyers to prepare for
8	Again, there are a lot of case-control	8	this deposition?
9	studies. I don't know if I can recall exactly	9	A I have.
10	which ones I may have reviewed.	10	Q When did that start?
11	Are we talking since I issued my report?	11	A I can't remember the exact date, but
12	Q My question is, what did you do to	12	probably a month ago.
13	prepare for your deposition?	13	Q Since you submitted your report? Or did
14	A Right. And so that would be anything	14	it start before then?
15	that related I read so I looked at the	15	MR. ZELLERS: The preparation for
16	Hamilton study. The NTP studies. Keskin's.	16	deposition?
17	I really just went through my report and	17	MR. MEADOWS: Yes.
18	refreshed myself with some of these articles. And	18	THE WITNESS: So the meetings I had for
19	there's probably some that aren't in my report	19	preparation of deposition started about a month
20	that are just on my what was the title of this	20	ago, which would be after I generated my expert
21	list? Just the materials that I considered.	21	report.
22	Looked at Wahrheit. The NTP study of	22	BY MR. MEADOWS:
23	1,3-butadiene. The NTP study of I don't oh,	23	Q Who did you meet with to prepare for
24	yeah. So the NTP studies of benzene, of	24	your deposition?
25	4-cyclo sorry, 4-vinylcyclohexene. The NTP	25	A Mr. Zellers, Jessica Miller, Geoffrey
	Page 87		Page 89
1	studies of nitrofurazone. The NTP study of	1	White
2		±	Willie
	nitrofurantoin. The NTP study of N-methylmac	2	MR. WYATT: Wyatt.
3	-		MR. WYATT: Wyatt.
	nitrofurantoin. The NTP study of N-methylmac	2	MR. WYATT: Wyatt.
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İ	Page 90		Page 92
1	25, right?	1	cleavage fragments.
2	A In general.	2	How many hours have you spent on that?
3	Q Where did these meetings take place?	3	A I didn't look to see how many hours I
4	A Some occurred here and in our Seattle	4	spent on that project.
5	office or Red we're in Redwood, Washington.	5	Q Is that has that been a big project?
6	Q And the meetings never lasted any more	6	A I I don't know what you mean by
7	than five hours at a time?	7	"big."
8	A Generally, that's my recollection.	8	Q Has it consumed most of your time?
9	Q Were you ever videotaped in preparation	9	A Well, it depends what the time period
10	for your deposition today?	10	you're asking.
11	A I was not.	11	Q Okay. What time period did it consume
12	Q Anything else you did besides review	12	most of your time?
13	your report, look at articles, read depositions,	13	MR. ZELLERS: Objection. Form.
14	and meet with lawyers in order to prepare for your	14	THE WITNESS: I don't think that's what
15	deposition today?	15	I said.
16	A So I think that's that's the	16	BY MR. MEADOWS:
17	totality, as far as I can recall.	17	Q Okay. What did you say?
18	Q Are there specific depositions that you	18	A I was asking you, sorry, to clarify your
19	read in the last or since you drafted your	19	question.
20	report that you read in preparation for this	20	Q Well, has there been a period of time
21	deposition today?	21	since you started the project where the majority
22	A So I they are in my in my the	22	of your time has been spent working on that
23	complete list of materials, they're listed there.	23	particular project?
24	If you would like me to find them.	24	MR. ZELLERS: Objection. Vague.
25	Q I really want you to tell me based on	25	THE WITNESS: So which project are we
			Page 93
1	your memory, are there any specific depositions	1	talking about?
2	that you read in preparation for your deposition	2	BY MR. MEADOWS:
3	today?	3	Q Asbestos and cleavage fragments.
4	MR. ZELLERS: Objection. Vague. Form.	4	A Okay. And what is the time period that
5	THE WITNESS: So I I read through		
J		1 5	VOU're acking'
6		5	you're asking?
6 7	these depositions to understand more about the	6	Q Well, you told me that that's an ongoing
7	these depositions to understand more about the deposition process. I don't know if a specific	6 7	Q Well, you told me that that's an ongoing project that started around December of 2017, and
7 8	these depositions to understand more about the deposition process. I don't know if a specific if that meets the criteria of your question or	6 7 8	Q Well, you told me that that's an ongoing project that started around December of 2017, and it continues to it hasn't been closed.
7 8 9	these depositions to understand more about the deposition process. I don't know if a specific if that meets the criteria of your question or not.	6 7 8 9	Q Well, you told me that that's an ongoing project that started around December of 2017, and it continues to it hasn't been closed. So my question is, has there been a
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l	Page 94		Page 96
1	A I'd have to go back and look, but my	1	employee. It's more of an ownership position.
2	because I'm not sure if my rate has changed over	2	Q What month in 2018 did that start?
3	that time period. But my rate is my rate that I	3	A April.
4	would charge on every project, the same rate.	4	Q So it's been about a year?
5	Q What is your rate?	5	A Yes.
6	A It's \$400 an hour for consulting, and	6	Q And before that, from 2013 to 2018, you
7	\$600 for deposition and trial testimony.	7	were senior toxicologist. Tell tell me how
8	Q And has that rate changed since was	8	that is different from being a principal.
9	that rate different in December of 2017?	9	A So the only difference is regarding an
10	A It may have been and probably was,	10	ownership position in the company.
11	because it was before I was promoted to principal.	11	Q Is the pay the same?
12	Q And what was the last rate that you had	12	A The pay is the same.
13	before the 400 and 600?	13	MR. ZELLERS: You don't have to get into
14	A I would have to go back to company	14	the pay, but all right, you answered.
15	records to look.	15	THE WITNESS: Well sorry.
16	Q Just don't remember?	16	MR. ZELLERS: That's fine.
17	A I don't. I don't want to be inaccurate.	17	THE WITNESS: Yeah, my salary is the
18	Q Mm-hmm. And the records that you do	18	same.
19	have pertaining to your billing and your work on	19	BY MR. MEADOWS:
20	the J&J project that started in December of 2017	20	Q But now you're an owner in the company,
21	regarding asbestos and fragments, those are at	21	correct?
22	your office, right?	22	A I was before as well.
23	A Those are in our office records, I	23	Q As a senior toxicologist you were an
24	assume, yeah.	24	owner in the company?
25	Q Well, I'm going to ask you to make sure	25	A Correct.
1	Page 95		Page 97
1	those don't get disposed of because we're going to	1	Q Okay. I'm still not then I'm not
2	be asking for them. Okay?	2	understanding the difference between a senior and
3	MR. ZELLERS: And you she hears your statement. So	3 4	principal. Can you tell me what the difference is?
4	statement. So		
	DV MD MEADOWC.		
5	BY MR. MEADOWS:	5	A The level of ownership.
6	Q Just to be clear, we will be asking for	5 6	A The level of ownership.Q The level of ownership. Okay.
6 7	Q Just to be clear, we will be asking for your billing records and all records pertaining to	5 6 7	A The level of ownership.Q The level of ownership. Okay.So tell me how that's changed for you
6 7 8	Q Just to be clear, we will be asking for your billing records and all records pertaining to that project at some point in time. So do not let	5 6 7 8	A The level of ownership. Q The level of ownership. Okay. So tell me how that's changed for you from becoming a from going to a senior to a
6 7 8 9	Q Just to be clear, we will be asking for your billing records and all records pertaining to that project at some point in time. So do not let those get destroyed, okay?	5 6 7 8 9	A The level of ownership. Q The level of ownership. Okay. So tell me how that's changed for you from becoming a from going to a senior to a principal.
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1 you have a different level of ownership in the company, and your bonus, I assume, is potentially greater now. Is that fair to say? 4 A The bonus structure is different. 5 Q I would assume it's better as a principal than it is as a senior toxicologist. 6 PMR, ZELLERS: Objection. Form. 7 MR, ZELLERS: Objection. Form. 8 THE WITNESS: So I would say it's different and it it depends on the year. 9 MR, MELADOWS: 10 BY MR, MEADOWS: 11 Q Tell me why is it that you became a principal. How did that happen and why did it happen? 12 principal. How did that happen and why did it happen? 13 happen? 14 A I the the company right now, the principals are older, and they want some younger people to come in to assume hopefully in the trying to get younger people in. 19 Q Was Veritox doing any work for J&J 20 before you started doing the asbestos/cleavage far gament work for them in December of 2017? 2 A I'm not sure when Bryan Hardin 22 Dr. Hardin's work began. 24 Q So Dr. Hardin's work may have started after yours did? Page 99 1 A I don't know when his started. 2 Q Is he still doing work for J&J 25 A Less a principal. 4 A I don't know when his started. 5 Q Way Earls are older, and they want some younger people to come in to assume hopefully in the trying to get younger people in. 2 A I'm not sure when Bryan Hardin 22 A I'm not sure when Bryan Hardin 22 A I'm not sure when Bryan Hardin 23 Br. Hardin's work began. 24 Q So Dr. Hardin's work may have started after yours did? Page 99 1 A I don't know when his started. 2 Q Is he still doing work for J&J? 3 A I don't know the status of his projects. 4 Q What is his position at Veritox? 4 A Longer than I've been there. 5 Q Did - has Veritox been paid more from J&J as a result of the asbestos/cleavage fragment work than they've been paid from J&J on the litigation work that you've done? 10 Work than they've been paid from J&J on the litigation work that you've done? 11 Less a principal. 12 A So I'm not in a position right now to 12 to speculate on how much wa	age 100
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to speculate on how much was with the asbestos and 13 that was December 4th, 2018.	.000
	nd page,
14 classage from our growth That would be a con-	
14 cleavage fragment work. That would be a guess. 14 Q Okay.	
15 Q Well, have you spent more hours working 15 A So the beginning of December 2	018 is
on the asbestos and cleavage fragment work than 16 when we started.	
you have spent so far working on the litigation 17 Q And that would be consistent with	th you
18 work? 18 having been Ms. Curry having reached	
19 A Well, I haven't thought about how many 19 at the end of November of 2018, right?	
20 hours in total I I worked on the asbestos and 20 A Ms. Curry reached out to me the	end of
21 cleavage fragment work in order to do a 21 November 2018.	
22 comparison. 22 Q And at that point, did you enter i	into a
Q Just no clue as to whether one is more 23 written engagement between well, did	
24 than the other. 24 into a written engagement at that point?	
25 MR. ZELLERS: Objection. Form. 25 A No, there was not a written engage	gement.

	Page 102		Page 104
1	Q Is there one now?	1	documents you have there?
2	A No, there's not.	2	A It's probably about 300,000.
3	Q There's no formal written contract	3	Q About 300,000. Okay.
4	between you or Veritox and J&J or anyone else that	4	So that's 300,000 for work done over the
5	is that would be the basis of what you're	5	course of three months?
6	the services you're performing in this case.	6	A Yes.
7	A It was not a retainment letter, I think	7	Q So about \$100,000 a month roughly?
8	is what you're referring to, for for this,	8	A If you do the that's the average.
9	correct.	9	Q All right. So going back to the work
10	Q Is that standard for Veritox? Do they	10	that started with J&J in December of 2017, have
11	usually enter into written agreements with the	11	you has there been any month where you have
12	people they work for?	12	billed in the neighborhood of \$100,000 to J&J for
13	A So some I would say some clients do	13	that work?
14	have written agreements and some don't.	14	A Well, I'd have to again go back and look
15	Q And why do some have and others don't?	15	at the records.
16	A I don't know why	16	Q You just have no way of having any feel
17	Q What's	17	for that as you sit here today.
18	A people do what they do.	18	A Well, I could guess, but I didn't think
19	Q Well, what is Veritox's typical practice	19	I was supposed to guess. I mean, I want to be
20	in that regard?	20	accurate in my testimony.
21	MR. ZELLERS: Objection. Form.	21	Q When were your when does we're now
22	Foundation.	22	at April 4th. When will your March bill go out?
23	THE WITNESS: Well, so like I said,	23	A I don't know exactly when it will go
24	sometimes there are written engagements and	24	out. I'm I assume our accounting department is
25	sometimes there are not.	25	working on it.
	Page 103		Page 105
	5		rage 105
1	BY MR. MEADOWS:	1	Q I see on this bill that it looks like
1 2	BY MR. MEADOWS: Q Well, is Veritox the one in whatever	1 2	
	BY MR. MEADOWS:		Q I see on this bill that it looks like
2	BY MR. MEADOWS: Q Well, is Veritox the one in whatever relationship that dictates whether or not there is going to be a written engagement or is it the	2	 Q I see on this bill that it looks like it's going to the law firm of Orrick. A Correct. Q Attention Peter Bicks. Do you know
2 3	BY MR. MEADOWS: Q Well, is Veritox the one in whatever relationship that dictates whether or not there is going to be a written engagement or is it the person that's hiring you?	2 3	Q I see on this bill that it looks like it's going to the law firm of Orrick. A Correct.
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	Page 106		Page 108
1	that called me for the asbestos and cleavage	1	A No, not those specific test articles.
2	fragment work was Jonathan Cooper.	2	Q What percentage of your work pertains to
3	BY MR. MEADOWS:	3	litigation, whether you've testified or not?
4	Q Jonathan Cooper. I'm sorry. Right.	4	A Again, I don't our company doesn't
5	And had you ever met Mr. Cooper before?	5	keep track of those type of records. So that
6	A I didn't recall meeting him before.	6	would be a guess.
7	Q Did he seem to feel like y'all had met	7	Q Well, is more of your work dedicated to
8	before?	8	litigation than anything else?
9	MR. ZELLERS: Well, again, I'm going to	9	MR. ZELLERS: Objection. Form.
10	instruct her not to talk about or divulge	10	THE WITNESS: So it it depends on the
11	communications with counsel.	11	current project workload.
12	So I'll instruct you not to answer that	12	BY MR. MEADOWS:
13	question.	13	Q So over the last year, has more of your
14	BY MR. MEADOWS:	14	work been dedicated to litigation or not?
15	Q Was Mr. Cooper present at your summer of	15	A Again, it's hard hard to say. I work
16	2017 presentation that we have slides for here	16	on a variety of projects for a lot of different
17	today?	17	entities. So obviously this work in the last
18	MR. ZELLERS: Foundation, form	18	three months, if we're talking about an average,
19	objection.	19	is going to impact the overall average. So I'm
20	THE WITNESS: So I don't know exactly	20	not I'm not sure.
21	who was present and who wasn't present. He he	21	Q Did in in the course of your
22	told me that he was there.	22	preparation of your well, in the course of your
23	MR. ZELLERS: Okay. And again, I'd ask	23	work on this case, have you been provided with any
24	you not to divulge or talk about communications	24	internal company documents?
25	with counsel. But that's that's fine.	25	A So the the work on this case, I
	Page 107		Page 109
1	THE WITNESS: Okay.	1	received some documents that were attachments
2			
2	BY MR. MEADOWS:	2	to so I guess the simple answer is yes, and I
3	Q What percentage of your work since	3	can I can tell you which ones.
3 4	Q What percentage of your work since December of 2017 has been with respect or has	3 4	can I can tell you which ones. Q They would be referenced in your list?
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	Page 110		Page 112
1	present, and then it goes to this human studies.	1	Q Approximately what time period was that?
2	Q Okay.	2	A Before June. I I don't know exactly
3	MR. ZELLERS: And that's the last page	3	when it was. Months before that.
4	of the materials that were available?	4	Q And who asked him to do this
5	THE WITNESS: Yes, for	5	presentation?
6	MR. ZELLERS: For the summer	6	A Who asked him?
7	THE WITNESS: Yeah, this is the last	7	Q Yes.
8	page of the materials that were available for the	8	A I don't know.
9	conference attendees.	9	Q And so you agreed to present?
10	BY MR. MEADOWS:	10	A I I did agree to present, to do the
11	Q That's the one that has it's "Talc	11	literature or to review the literature and
12	Dusted Diaphragms"?	12	present the subject.
13	A Yes.	13	Q Okay. So this group of slides that we
14	Q But as far as what you presented, it	14	have here well, first of all, let me ask you
15	ends somewhere before that.	15	this: This was done
16	A Right. It ends the one right before	16	MR. MEADOWS: Let me have this.
17	the that page that says "Additional slides."	17	(Counsel conferring.)
18	Q "Additional slides." Okay. Good	18	BY MR. MEADOWS:
19	enough. Thank you.	19	Q Who is the American Conference? Is that
20	All right. So tell me how this how	20	who is that who sponsors this?
21	did this come about that you had this opportunity	21	A It's put on by the American Conference
22	to to speak at this conference?	22	Institute.
23	A So one of my colleagues, Dr. Kelman,	23	Q Okay. We're going to mark these what
24	came and asked me, he said there's there was an	24	are we on, 3?
25	opportunity that someone had asked him to do an	25	MR. MEADOWS: Okay. Mark this as 3 and
	Page 111		Page 113
1	analysis of the causation analysis of	1	that as 4.
2	between talc and ovarian cancer, and understand	2	(Moore Exhibit Nos. 3 and 4 were
3	the difference in the causation analysis between	3	marked for identification.)
4	asbestos and mesothelioma.	4	BY MR. MEADOWS:
5	Q This was Dr. Kelman?	5	Q Let me show you what I've marked as
6	A Kelman. K-E-L-M-A-N.	6	Exhibits 3 and 4.
7	Q Okay. Someone had come and to him	7	MR. ZELLERS: Do you have any copies?
8	and asked him what?	8	Okay, great.
9	A Asked him to do a presentation on the	9	MR. MEADOWS: I believe I do.
10	subject matter.	10	MR. ZELLERS: Thank you.
11	Q Okay. And who is Dr. Kelman again?	11	THE WITNESS: Thank you.
12	A So he is the principal and president of	12	MR. MORIARTY: Do you have any extras?
13	Veritox. A principal toxicologist and president.	13	BY MR. MEADOWS:
14	Q Okay. All right. So somebody asked	14	Q Have you had a chance to take a glance
15	him	15	at at least No. 3, Exhibit 3?
16	A Asked him to do it	16	A Yes, I have seen this.
17	Q to do a presentation	17	Q Okay. And to me it appears to be an
18	A and he was unable to do it, and asked	18	agenda for this particular conference. How would
19	me if I was was interested and would be	19	you characterize it?
20	available.	20	MR. ZELLERS: Form, foundation.
	Q When you say he was unable to do it,	21	Objection.
21			
21 22	what what do you mean by that?	22	THE WITNESS: So I don't know what this
21 22 23	what what do you mean by that? A He had some kind of conflict, I believe.	23	is, to be honest. It seems to be about this
21 22	what what do you mean by that?		

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1 I highlighted it for you up there on the 2 screen if that helps. 3 A That's what it says. I can't remember 4 if that was the exact time. 5 Q Okay. And this was at the Wyndham Grand 6 in Chicago, right? 7 A Yes. 8 Q It looks like it was a three-day 9 conference. 10 MR. ZELLERS: Can you show her what 11 Q By the way, who did create this PowerPoint presentation? 2 PowerPoint presentation? 3 A So I I did. 4 Q You did. You did all of it? 5 A Well, with some help from some deck, yes deck, yes. 7 deck, yes. 8 Q Okay. And did you consult at a power you agreed to give this present the present of the power you agreed to give this present you're looking at? 10 MR. ZELLERS: Object to form the power you agreed to give the present you're looking at? 11 MR. ZELLERS: Object to form the power you agreed to give the present you're looking at? 12 Foundation.	wn here it Broom,
2 there, right? 3 A It is. 4 Q Dr. H. NADIA MOORE, 5 American Conference Lostitute, and de says it's sponsored by Hepler Heple right? 6 Environmental Litigation. 7 And it identifies you as a speaker, 8 right? 9 A Yes, I believe that's true. 9 A Yes, I believe that's true. 10 Q And so have you ever spoken at one of 10 Q Okay. Are you familiar with 1 firm? 11 these conferences before? 12 A I had not. 13 Q No? Okay. And Exhibit 4 first of 11 firm? 14 all, before we go to Exhibit 4, Exhibit 3 14 referenced. 15 describes what the conference is all about. I 15 Blank Rome, are you familiar with 1 firm? 16 notice the title is "Tale: The Next Asbestos? 16 firm? 17 Analyzing Recent Explosion of Tale Related 17 And then it describes what the 19 your PowerPoint presentation. 20 who - who made up this description, "What is it 20 about?" 21 A Well, so that's the title. I don't know 2 who - who made up this description, "What is it 20 about?" 22 Who - who made up this description, "What is it 20 about?" 24 Q The date, June 22, 9:30 a.m., is that 24 right? 25 when the conference was? Page 115 1 I highlighted it for you up there on the 2 screen if that helps. 3 A That's what it says. I can't remember 2 if that was the exact time. 4 if that was the exact time. 5 Q Okay. And this was at the Wyndham Grand 6 in Chicago, right? 7 A Yes. 8 Q It looks like it was a three-day 2 conference. 9 G Nay. And did you consult at a conference. 10 MR. ZELLERS: Can you show her what 11 you're looking at? 11 MR. ZELLERS: Object to form 5 foundation.	wn here it Broom,
4 Q Dr. H. NADIA MOORE, 5 AmericanConference.com, Sixth Annual Toxic Tort 6 Environmental Litigation. 7 And it identifies you as a speaker, 8 right? 9 A Yes, I believe that's true. 10 Q And so have you ever spoken at one of 11 these conferences before? 11 these conferences before? 11 these conferences before? 12 A I had not. 13 Q No? Okay. And Exhibit 4 – first of 14 all, before we go to Exhibit 4, Exhibit 3 15 describes what the conference is all about. I 16 notice the title is "Tale: The Next Asbestos? 17 Analyzing Recent Explosion of Tale Related 18 Claims." 19 And then it describes what the 20 conference is all about, right? 21 A Where are you? No. 22 Who — who made up this description, "What is it 23 about?" 24 Q The date, June 22, 9:30 a.m., is that 25 when the conference was? 26 A Yes. Page 115 Page 115 Page 115 Q Okay. And this was at the Wyndham Grand 6 in Chicago, right? A Yes. Q Okay. And did you consult at a good of the conference. MR. ZELLERS: Can you show her what 11 you're looking at? MR. MEADOWS: Yeah. Right here 12 Foundation. A That — I mean that's — A That — I mean that's — Go ahead. That — I Heal THE WITNESS: That's what is if A THE WITNESS: That's what is if BY MR. MEADOWS: Yeah. Right here 10 MR. ZELLERS: Object to form 10 Q Okay. Are you familiar with the firm? 11 The proving familiar with the referenced. 12 The proving familiar with the referenced. 13 A That what it says. I can't remember 14 if that was the exact time. 15 Q Okay. And this was at three-day 26 Conference. 27 A Yes. 3 Q It looks like it was a three-day 3 A Conference. 4 Q Noway. 4 Ookay. And did you consult at a good of the familiar with the firm? 4 A Yes. 4 Q Ookay. And did you consult at a good of the familiar with the firm? 4 A Yes. 4 Q Ookay. And did you consult at a good of the familiar with the firm? 4 A Yes. 4 Q Ookay. And did you consult at a good of the familiar with the familiar with the firm? 4 A Yes. 4 Q Ookay. And did you consult at a good of the familiar with the firm? 5 Q Ookay. And did you consult at a	
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12 (11.4)	
13 (indicating). 13 BY MR. MEADOWS:	
14 THE WITNESS: Oh, I think originally it 14 Q Did J&J look at your presentati	on before
15 was three, but it wasn't actually. 15 it was given?	
16 BY MR. MEADOWS: 16 A No.	
17 Q All right. So back to my question, have 17 Q Or submitted?	
18 you ever spoken at one of these conferences 18 A No.	
19 before? 19 Q And so the first bullet point you	
20 A So at an ACI conference? 20 on today's presentation bounds says: "T	
21 Q Yeah. 21 to cosmetic talc without asbestos."	
22 A I thought I answered that, no, I had 22 Is that the way that reads?	
23 not. 23 A That is. You read that correctly	Talc refers
24 Q Okay. Do you know if Dr. Kelman had? 24 Q And then it says: "Cosmetic tal	Talc refers
25 A I don't know. 25 arguably could be contaminated with as	Talc refers

4 Is that what you said? 5 A Yes, I believe that's what you — you 6 read that correctly. 7 Q And then down here you've got, "Asbestos refers to fibrous amphiboles." Right? 9 A Yes. 10 Q And then, "Exposure/disease relationship of absestos and mesothelioma causation established," and then "tale and ovarian cancer," you have a question mark. Right? 13 you have a question mark. Right? 14 A You've read that slide, yes. 15 Q You would agree that cosmetic tale can be contaminated or it can have asbestos in it, right? 18 MR. ZELLERS: Objection to form. 19 THE WITNESS: So that's a pretty general question. 19 THE WITNESS: So that's a pretty general tale arguably could be contaminated with asbestos." Right? 21 BY MR. MEADOWS: 22 Q Now, did you — at this conference did you have opportunity to meet with or communicate with lawyers who are working on this lifigation? 23 THE WITNESS: So hat's a pretty general question. 24 asbestos." Right? 25 A The — correct. There's been some 26 Well, you said it right here: "Cosmetic tale arguably could be contaminated with asbestos." Right? 27 A The — correct. There's been some 28 PAR. MEADOWS: 29 Q Now, did you — at this conference did you have opportunity to meet with or communicate with lawyers who are working on this lifigation? 29 MR. ZELLERS: Objection. Foundation. THE WITNESS: So at the time, I guess I did talk how show aws working on the lifigation and who wasn't working on the lifigation and who wasn't working in this lifigation? 29 Well, there were others there speaking on this topic as well, right? 21 A That's — other people spoke, yes. 22 Q Mell, there were others there speaking on this topic, right? 23 A That's — other people spoke, yes. 24 A Right. But I think your — your question also said other attorneys that were speaking in this litigation, and I didn't know if the your portunity to meet those other speakers? 24 A That was in May of 2018, that was after you had started doing the asbestos/cleavage fragment we for JAB, correct? 25 A Row had already — I had already as the w		Page 118		Page 120
today is without asbestos." 4	1	the majority of ovarian cancer cases do not	1	result of this conference about the prospect of
4 Is that what you said? 5 A Yes, I believe that's what you you 6 read that correctly. 7 Q And then down here you've got, "Asbestos 8 refers to fibrous amphiboles." Right? 9 A Yes. 10 Q And then, "Exposure/disease relationship of obsestos and mesothelioma causation established," and then "tale and ovarian cancer," you have a question mark. Right? 11 A You've read that slide, yes. 12 Q You would agree that cosmetic tale can be be contaminated or it can have asbestos in it, right? 11 PIE WITNESS: Objection to form. 12 PITE WITNESS: Objection to form. 13 WR. ZELLERS: Objection to form. 14 MR. ZELLERS: Objection to form. 15 BY MR. MEADOWS: 16 Well, you said it right here: "Cosmetic tale arguably could be contaminated with asbestos." Right? 17 A The - correct. There's been some 18 With lawyers who are working on this litigation? 19 Well, there were others there speaking on this topic as well, right? 10 debate. 11 Q Okay. 12 A That's - other people spoke, yes. 13 Q There were lawyers there who were speaking on this topic as well, right? 14 A Correct. 15 Q And so my question is, did you get an opportunity to meet those other speakers? 16 Q And so my question is, did you get an opportunity to meet those other speakers? 18 A Right. But I think your your question also said other attorneys that were worked and this flow, who was a then tingation or if they were actually working in the litigation or if they were actually working in the litigation or if they were actually working in the litigation or if they were actually working in the litigation or if they were actually working in the litigation or if they were actually working in the litigation or if they were actually working in the litigation or if they were actually working in the litigation or if they were actually working in the litigation or if they were actually working in the litigation and if didn't know if the wash of the literature that we just as a correct. 4 A So we had already I had already as a few pust and the correct. A so we had already I h	2	allege asbestos contamination and, thus, talc ^ Ck	2	you working in this litigation?
5 A Yes, I believe that's what you you read that correctly. 7 Q And then down here you've got, "Asbestos refers to fibrous amphiboles." Right? 9 A Yes. 10 Q And then, "Exposure/disease relationship of asbestos and mesothelioma causation 12 established," and then "lac and ovarian cancer," 13 you have a question mark. Right? 14 A You've read that slide, yes. 15 Q You would agree that cosmetic tale can be contaminated or it can have asbestos in it, 16 right? 18 MR_ZELLERS: Objection to form. 19 THE WITNESS: So that's a pretty general question. 21 BY MR_MEADOWS: 22 Q Well, out add it right here: "Cosmetic tale car asbestos." Right? 23 tale arguably could be contaminated with asbestos." Right? 24 asbestos." Right? 25 A The correct. There's been some Page 119 debate. 2 Q Now, did you at this conference did you have opportunity to meet with or communicate with who wasn't working on the litigation. 3 What is working on the litigation. 4 With lawyers who are working on the litigation. 5 MR_ZELLERS: Objection. Foundation. 6 THE WITNESS: So at the time, I guess I did with know who was working on the litigation? 4 With lawyers who are working on the litigation and who wasn't working on the litigation. 4 With lawyers who are working on the litigation and who wasn't working on the litigation. 5 Q Well, did you at this is conference, did you have follow-up communications with any lawyers about the prospect of working in this litigation? 6 MR_ZELLERS: Objection Foundation. 7 THE WITNESS: So at the time, I guess I did you have opportunity to meet with or communicate with who wasn't working on the litigation and who wasn't working on the litigation and who wasn't working on the litigation and who wasn't working in the litigation and who wasn't working in the litigation. 9 BY MR_MEADOWS: 10 Q Well, there were others there speaking on the litigation and with as a pretty general question also said other attorneys that were speaking on this topic, right? 16 Q And so my question is, did you get an opportunity to meet th	3	today is without asbestos."	3	MR. ZELLERS: Objection. Forming or
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7 Q And then down here you've got, "Asbestos refers to fibrous amphiboles." Right? 9 A Yes. 10 Q And then, "Exposure/disease relationship of asbestos and mesothelioma causation established," and then "fale and ovarian cancer," you have a question mark. Right? 11 A You've read that slide, yes. 12 Q Vou would agree that cosmetic tale can be contaminated or it can have asbestos in it, right? 13 MR. ZELLERS: Objection to form. 14 MR. ZELLERS: Objection to form. 15 MR. ZELLERS: Objection to form. 16 MR. ZELLERS: Objection to form. 17 HIE WITNESS: So that's a pretty general question. 18 BY MR. MEADOWS: 19 Q Vell, you said it right here: "Cosmetic tale arguably could be contaminated with asbestos." Right? 20 Q Now, did you – at this conference did you have opportunity to meet with or communicate with lawyers who are working on this litigation? 21 MR. ZELLERS: Objection. Foundation. 22 Page 119 23 Ide darguably could be contaminated with asbestos." Right? 24 A The – correct. There's been some 25 Page 119 26 debate. 2 Q Now, did you – at this conference did you have opportunity to meet with or communicate with lawyers who are working on this litigation? 3 Q New ave opportunity to meet with or communicate with lawyers who are working on the litigation and who wasn't working on the litigation and for the popule spoke, yes. 13 Q Ner were lawyers there who were speaking on this topic as well, right? 14 A That's – other people spoke, yes. 15 A Correct. 16 Q And so my question is, did you get an opportunity to meet those other speakers? 18 A Right. But I think your – your question also said other attorneys that were working in this litigation, and I didn't know if they were actually working in the litigation or if they were just presenting material like I was that – that it occurred.	5	A Yes, I believe that's what you you	5	THE WITNESS: Okay, so I guess, can you
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23 that that it occurred. 23 assembled a lot of the literature that we just	22		22	
24 Q Did you have any communications with 24 discussed for the ACI talk, and in talking with			24	discussed for the ACI talk, and in talking with
	24	Q Did you have any communications with		
				others in my office, we thought it would be a good

	Page 122		Page 124
1	idea to present at AIHce. And so I got together	1	MR. ZELLERS: Okay. Hold on. So I will
2	with two other individuals and we put together a	2	let you answer that question "yes" or "no." I
3	proposal for a session at AIHce, which is the	3	I am instructing you not to talk about the
4	American Industrial Hygiene Conference and	4	consulting you did for J&J, but you can answer
5	Exposition.	5	Mr. Meadows' question if you're able to.
6	Q So this was Veritox you and Veritox	6	THE WITNESS: So by by J&J, you mean
7	making a decision that you wanted to make a	7	the attorneys?
8	presentation at this particular conference, right?	8	BY MR. MEADOWS:
9	A So this is a scientific conference. We	9	Q Anybody. I mean did you did you talk
10	were always looking for opportunities to present	10	to the attorneys or J&J directly about the fact
11	science that we've done, and so we looked for the	11	that you were going to be giving this
12	opportunity, and submitted a proposal for this	12	presentation?
13	work.	13	A I let them know that I was giving the
14	Q Okay. But by now you had been doing	14	presentation.
15	work for J&J on the asbestos/cleavage cleavage	15	Q And did did you submit your slides or
16	fragment issue, right?	16	your ideas about the presentation to J&J or the
17	A Well, so the proposal that was true	17	lawyers before you before you turned it in for
18	when I gave the talk. The proposal was due in	18	presentation?
19	fall of 2017. So that would have been before I	19	MR. ZELLERS: All right. I'll allow you
20	started the cleavage fragment consultation.	20	to answer that question.
21	Q And so it looks like you you gave	21	THE WITNESS: So I can't remember the
22	this presentation along with two others; is that	22	exact timing of when that occurred, but we gave
23	correct?	23	the J&J attorneys a copy of the PowerPoint. And
24	A Two others helped me with the	24	again, I don't know which came first, the
25	presentation, yes.	25	submission for AIHce or that e-mail that went to
	Page 123		Page 125
1	Q Okay. And they both are from Veritox?	1	the attorneys. We copied basically both places at
2	A Yes.	2	the same time.
3	Q And that's Bryan Hardin and Karen	۱ -	
4		3	BY MR. MEADOWS:
	Heymann?	4	Q Did anyone outside of Veritox, whether
5	A That's correct.		Q Did anyone outside of Veritox, whether it be J&J or lawyers or anybody else, have any
	-	4	Q Did anyone outside of Veritox, whether
5	A That's correct. Q Who put this presentation together, the PowerPoint?	4 5	Q Did anyone outside of Veritox, whether it be J&J or lawyers or anybody else, have any input or suggestions about the presentation? A No.
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	Page 126		Page 128
1	MR. ZELLERS: Objection. Form.	1	MR. LOCKE: Objection.
2	THE WITNESS: So I'm an expert in	2	THE WITNESS: My degree does not say
3	toxicology, and the practice of toxicology	3	epidemiology. Epidemiology is part of public
4	actually involves multiple disciplines.	4	health, which is where my discipline comes from.
5	BY MR. MEADOWS:	5	BY MR. MEADOWS:
6	Q Okay. So what do you consider yourself	6	Q Do you have a degree in exposure
7	to be an expert in?	7	science?
8	A So as a toxicologist, I have to	8	A Again, exposure science is part of the
9	integrate a lot of datasets from exposure science,	9	broader context of toxicology.
10	molecular biology, cancer biology, physiology,	10	Q Can anyone get a degree in exposure
11	epidemiology. So basically integrating the entire	11	science?
12	scientific dataset to understand toxicology	12	MR. ZELLERS: Objection. Form.
13	issues.	13	Go ahead.
14	Q We know you're you hold yourself out	14	THE WITNESS: So that that is a
15	as an expert in toxicology, right?	15	degree.
16	A Yes.	16	BY MR. MEADOWS:
17	Q All right. I want you to tell me what	17	Q Okay. That you do not have, correct?
18	are the areas you claim to be an expert in.	18	A That's correct.
19	MR. ZELLERS: Objection. Asked and	19	Q All right.
20	answered.	20	A But I can just also add that I am a
21	THE WITNESS: So I think as a	21	board certified toxicologist. Part of the boards
22	toxicologist, I have to practice in many areas.	22	involve testing in a variety of areas. All of
23	So you have molecular biology listed. Also I need	23	these areas that we've listed are on the board
24	to understand and critically review epidemiology	24	exams.
25	studies. Exposure science. Chemistry and	25	Q Okay. I wrote it down toxicology, you
	Page 127		D 120
	,		Page 129
1	properties of test materials. Physiology.	1	are board certified, right?
1 2		1 2	
	properties of test materials. Physiology.		are board certified, right?
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2 3 4 5 6 7 8	properties of test materials. Physiology. And I'm not going to represent that's the entire universe of of what I'm versed in, but those BY MR. MEADOWS: Q I didn't ask you what you were versed in. I asked you what you're an expert in. A Right. But as being an expert in toxicology, you need I I need to understand	2 3 4 5 6 7 8	are board certified, right? A That's correct. Q You have a degree, right? A I do have a degree. Q Chemistry and properties of test materials, do you have a degree in that? A I do have a degree in chemistry. Q Okay. Is is that a specialized degree, chemistry and properties of test
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	Page 130		Page 132
1	Q Okay. You don't have a degree in	1	foundation.
2	characterization of test materials, but that may	2	THE WITNESS: So so say that again.
3	just be because they don't have a degree for that,	3	Sorry, I was or I can read it.
4	right?	4	BY MR. MEADOWS:
5	A Sure.	5	Q Does someone who has a degree in these
6	Q But you would say that you are an expert	6	fields have a greater degree of expertise than you
7	in that, nonetheless, correct?	7	do?
8	A Correct.	8	A I think
9	Q Physiology. Do you have a degree in	9	MR. ZELLERS: Same objections.
10	physiology?	10	THE WITNESS: I think that depends on
11	A I do not have a degree in physiology,	11	the subject matter that you are evaluating.
12	but again toxicology covers many disciplines, and	12	BY MR. MEADOWS:
13	I have taken coursework and my board certification	13	Q All right. So you gave me a list of
14	would encompass all of the fields that you've	14	one, two, three, four, five six, and we'll
15	listed.	15	throw in characterization of test materials as
16	Q Well, I didn't list them. You listed	16	seven areas that you claim to be an expert in,
17	them.	17	right?
18	A I I stated them, and I'm just	18	A Again, these are fields that I use as
19	clarifying the list that you wrote down.	19	part of my daily practice as a toxicologist.
20	Q Okay. What is physiology?	20	Q Do you claim to be an expert in these
21	A Physiology is the the way the body	21	fields or not?
22	works.	22	MR. ZELLERS: Objection. Asked and
23	Q And you would agree that there are	23	answered, form.
24	people out there who do have degrees in molecular	24	THE WITNESS: So I'm an expert in
25	biology, right?	25	toxicology, and part of that expertise involves
			- 400
	Page 131		Page 133
1			
	A There are degrees in molecular biology.	1	those disciplines.
2	Of course, I use molecular biology as part of my	2	BY MR. MEADOWS:
2	Of course, I use molecular biology as part of my toxicology practice.	2 3	BY MR. MEADOWS: Q So are you telling me that you're an
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	Page 134		Page 136
1	disciplines, and it depends where you draw the	1	a true or false answer, correct?
2	line when you enter into subdivisions of the areas	2	A That's not what
3	we use in our practice.	3	MR. LOCKE: Objection.
4	Q I'm a lawyer. I know a little bit about	4	MR. ZELLERS: Objection to form.
5	wills and a little bit about criminal law, but I	5	THE WITNESS: That's not what I said.
6	would never claim to be an expert on it. I know	6	BY MR. MEADOWS:
7	that wills and the criminal law can have an impact	7	Q So you cannot answer that one true or
8	on what I do as a lawyer, like the type of	8	false?
9	practice that I'm doing right now, but I would	9	MR. ZELLERS: Objection. Asked and
10	never claim to be an expert on it. Because there	10	answered.
11	are lawyers out there who are experts on it.	11	THE WITNESS: I I answered that, that
12	I understand that you need a basis, a	12	epidemiology is part of toxicology.
13	basic little understanding of different areas of	13	BY MR. MEADOWS:
14	science. But my question is, has to do with	14	Q True or or false. I'm going to
15	whether you claim to be an expert in in	15	circle "or." I didn't hear a true or false on
16	specific fields.	16	that one. Dr. Moore is
17	I'm going to ask you one more time. Are	17	MR. ZELLERS: Okay. Just misstates the
18	you an expert in epidemiology?	18	evidence. But go ahead, Counsel.
19	MR. ZELLERS: Objection. Asked and	19	BY MR. MEADOWS:
20	answered, form.	20	Q an expert in molecular biology. True
21	THE WITNESS: So again, epidemiology is	21	or false, which one should I mark?
22	part of the practice of toxicology.	22	A Again, molecular biology is one of the
23	BY MR. MEADOWS:	23	fundamental tools that we use as a toxicologist.
24	Q Let's try it this way. Dr. Moore is an	24	So so that's what my answer is.
25	expert in epidemiology. True or false?	25	Q This is another one that you can't
23	expert in epideniiology. True of faise:		
	Page 135		Page 137
1	MR. ZELLERS: Objection. Form, asked	1	answer true or false to?
2	and answered.	2	MR. ZELLERS: Objection. Argumentative.
3	THE WITNESS. So open this		
	THE WITNESS: So again, this	3	Misstates the evidence.
4	epidemiology is part of a larger subset of the	3 4	Misstates the evidence. THE WITNESS: Again, I said molecular
4 5			
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5	epidemiology is part of a larger subset of the practice that I use every day as part of tox	4 5	THE WITNESS: Again, I said molecular biology is part of the practice of toxicology.
5 6	epidemiology is part of a larger subset of the practice that I use every day as part of tox as part of being a toxicologist.	4 5 6	THE WITNESS: Again, I said molecular biology is part of the practice of toxicology. BY MR. MEADOWS:
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1 selected. 2 MR. MEADOWS: Okay. Now is fine with 2 BY MR. MEADOWS: 3 me. 3 Q So, what I hear you sayin 4 MR. ZELLERS: Is this okay? 4 that are you saying that the law 5 MR. MEADOWS: Yeah. 5 to assess the methodology used by	
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4 MR. ZELLERS: Is this okay? 4 that are you saying that the law	ng now is
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The file of the fi	
6 THE VIDEOGRAPHER: Okay. The time is 6 experts? Is that what you're sayin	
7 12:06 p.m., and we're going off the record. 7 A So I was asked to to re	-
8 (Recess.) 8 methodology that was used by th	-
9 THE VIDEOGRAPHER: The time is 12:19 9 experts, to read their reports and	•
p.m., and we're back on the record.	
11 BY MR. MEADOWS: 11 their opinions.	a in rendering
12 Q Okay. So let's go back to your report, 12 Q Okay. And so I'm curiou	is what type
13 Dr. Moore. 13 I mean, I understand you're an ex	
14 A Okay. 14 toxicology and you can opine on	
15 Q And I highlighted the first sentence: 15 to toxicology, right?	issues pertaining
16 "I was asked to provide an expert opinion as a 16 A I'm an expert in toxicolog	TV/
17 toxicologist regarding alleged adverse health 17 Q And are you claiming to	
18 effects from exposure to Johnson's Baby Powder and 18 expert in assessing the methodological from the state of the stat	
19 Shower to Shower." 19 other experts with varying degree	-
20 And then it goes on to say: "I have 20 expertise?	28 01 01
, ,	ries that they
7 77 87	is are
, , , , , , , , , , , , , , , , , , , ,	h one Some
25 toxicology." 25 A So I'd have to look at eac	ii one. Some
Page 143	Page 145
1 Right? 1 of them are.	
2 A That's what it says, yes. 2 Q As you sit here today, do	you know which
1 I That's what it says, yes. 2 Q As you sit here today, do	you know winch
3 Q Okay. Now, this first sentence, "I have 3 ones are toxicologists and which of	
	ones are not?
Q Okay. Now, this first sentence, "I have 3 ones are toxicologists and which of	ones are not? n. Form.
Q Okay. Now, this first sentence, "I have also been asked to respond to plaintiffs' expert 4 MR. ZELLERS: Objection	ones are not? n. Form. w which ones are
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3	ones are not? n. Form. w which ones are on others. yself. training as a n the expertise thodology? n. Form. ethodology that I blogy. experts gave pinions, you're Is that what n. Form.
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	Page 146		Page 148
1 Q OI	, we're going to go through some of	1	understanding methods and critically reviewing
	s for sure. But I I'm just I'm	2	articles is just something that every graduate
3 trying to n	ake sure I understand what makes you	3	student is taught how to do.
4 think that	you are qualified to question the	4	BY MR. MEADOWS:
	gy of an expert that's not a	5	Q So you're saying any graduate student
6 toxicologi		6	can critique any expert and use any methodology
_	. ZELLERS: Objection. Form.	7	that they come up with, and that's acceptable.
	E WITNESS: So again, I'm I've	8	MR. ZELLERS: Objection. Form.
9 evaluated	he methods as they related to	9	THE WITNESS: That's not what I said at
	, and as toxicology, we went through I	10	all.
	sively through the break, encompasses a	11	BY MR. MEADOWS:
	disciplines. If we want to go	12	Q Is there a textbook or is there a body
	e individual critiques that I had	13	of literature that informs you on how to go about
_	heir their methodology, we can.	14	critiquing another expert's work?
	MEADOWS:	15	MR. ZELLERS: Objection. Form.
16 Q Ha	ve you ever been trained in how to go	16	BY MR. MEADOWS:
	quing the methodologies of other	17	Q Did you cite to that in your report?
18 scientists?		18	A Okay.
19 MR	. ZELLERS: Objection. Form.	19	MR. ZELLERS: Objection. Form.
	E WITNESS: So as part of my training	20	Go ahead.
	logist, one of the emphasis points was	21	THE WITNESS: Okay. So methods are
	iew of scientific data and articles,	22	defined on a method-by-method basis, so you need
23 and metho	dology specifically.	23	to understand what the method is in order to
	MEADOWS:	24	understand how to evaluate it.
	, what is your methodology that you	25	BY MR. MEADOWS:
	Page 147		Page 149
_	about critiquing other experts?	1	Q Is there any section in your report or
	I think we'd have to look into each	2	in your reference materials that cites to
_	each critique individually.	3	literature, articles, textbooks, that informs you
	you tailor your methodology to	4	how to critique another expert's work?
	expert it is that you're critiquing?	5	MR. ZELLERS: Objection. Form. Asked
	I think you have to evaluate the	6	and answered.
7 method as	an independent question.	7	BY MR. MEADOWS:
`	hat textbooks or articles or literature	8	Q It's a simple question. It's a "yes" or
	u on how to go about critiquing another	9	a "no." And listen, I know you've been taught to
•	ethodology?	10	not say "yes" or "no," but that's going to make
	I don't know that there's one	11	this thing go on forever and forever, and I don't
12 specific te	xtbook. It's a it's a training that	12	give up. So I'm going to keep asking the
-			
13 you go thi	ough as a graduate student on how to	13	questions until I get an answer. Okay?
13 you go thi 14 critique w	ork and how to do methods correctly.	13 14	questions until I get an answer. Okay? So here's the question here's the
13 you go the 14 critique w 15 Generally	ork and how to do methods correctly. accepted methodology that we all learn.	13 14 15	questions until I get an answer. Okay? So here's the question here's the question.
13 you go thi 14 critique w 15 Generally 16 Q Is	ork and how to do methods correctly. accepted methodology that we all learn. there a section in your report that	13 14 15 16	questions until I get an answer. Okay? So here's the question here's the question. MR. ZELLERS: All right. Move to strike
13 you go thi 14 critique w 15 Generally 16 Q Is 17 describes	ork and how to do methods correctly. accepted methodology that we all learn. there a section in your report that the methodology that you've used to go	13 14 15 16 17	questions until I get an answer. Okay? So here's the question here's the question. MR. ZELLERS: All right. Move to strike the comment of counsel.
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13 you go thi 14 critique w 15 Generally 16 Q Is 17 describes 18 about criti 19 Is there as 20 articles an 21 about prop 22 methodolo 23 MF 24 TH	ork and how to do methods correctly. accepted methodology that we all learn. there a section in your report that the methodology that you've used to go quing these other experts' methodology? section in this report that cites to d textbooks that tell us how to go perly critiquing another expert's pgy?	13 14 15 16 17 18 19 20 21 22	questions until I get an answer. Okay? So here's the question here's the question. MR. ZELLERS: All right. Move to strike the comment of counsel. MR. LOCKE: Objection. MR. ZELLERS: Ask your question if you have a question. BY MR. MEADOWS: Q Here's the question. Is there any part

	Page 150		Page 152
1	critiquing another expert's methodologies?	1	BY MR. MEADOWS:
2	MR. ZELLERS: Objection. Form. Asked	2	Q It's a simple one. It's a "yes" or a
3	and answered.	3	"no."
4	THE WITNESS: So I think there's	4	MR. ZELLERS: Objection. Form. Asked
5	references in here actually, I know there's	5	and answered.
6	references in here regarding correct	6	THE WITNESS: Okay. So there was a lot
7	methodologies.	7	in that last statement/question, so can you break
8	BY MR. MEADOWS:	8	it down one more time?
9	Q That's not what I'm asking you. I'm	9	BY MR. MEADOWS:
10	asking you if there are any textbooks or articles	10	Q Yeah.
11	that talk about how you or any other scientist	11	All right. I wrote a statement here.
12	can can perform a proper methodology in	12	There is no textbook that tells you, Dr. Moore,
13	critiquing another expert's methodology?	13	how to critique another expert's methodology. Is
14	MR. ZELLERS: Objection. Form.	14	that true or false?
15	BY MR. MEADOWS:	15	MR. LOCKE: Objection.
16	Q Is there is there any body of	16	MR. ZELLERS: Objection. Form, asked
17	literature in that regard, period?	17	and answered.
18	MR. ZELLERS: Objection. Form.	18	THE WITNESS: Okay. So each method
19	THE WITNESS: Well, so that's just part	19	is is a standalone
20	of a practice of toxicology and any any	20	BY MR. MEADOWS:
21	scientific field.	21	Q Yeah, but see, this is a true or false
22	BY MR. MEADOWS:	22	question.
23	Q Okay. My question was, is there any	23	MR. ZELLERS: Okay. Let her answer the
24	textbook or literature that you can tell is	24	question, please.
25	there one textbook you can name for me right now	25	BY MR. MEADOWS:
	Page 151		Page 153
1	that tells you how to go about critiquing another	1	Q But my question is a true or false one.
2			The state of the s
	expert's methodology?	2	So is it a true, a false or an "or"?
3	expert's methodology? MR. ZELLERS: Objection. Form.	3	So is it a true, a false or an "or"? A So
3 4	MR. ZELLERS: Objection. Form. THE WITNESS: So I can tell you that		
	MR. ZELLERS: Objection. Form. THE WITNESS: So I can tell you that	3	A So
4	MR. ZELLERS: Objection. Form.	3 4	A So MR. ZELLERS: Same objections.
4 5	MR. ZELLERS: Objection. Form. THE WITNESS: So I can tell you that there's coursework that you attend every that	3 4 5	A So MR. ZELLERS: Same objections. You can answer.
4 5 6	MR. ZELLERS: Objection. Form. THE WITNESS: So I can tell you that there's coursework that you attend every that you learn how to do this. This is not something	3 4 5 6	A So MR. ZELLERS: Same objections. You can answer. THE WITNESS: All right. So each method
4 5 6 7	MR. ZELLERS: Objection. Form. THE WITNESS: So I can tell you that there's coursework that you attend every that you learn how to do this. This is not something that is kind of black or white or can be defined,	3 4 5 6 7	A So MR. ZELLERS: Same objections. You can answer. THE WITNESS: All right. So each method has to be evaluated independently.
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	Page 154		Page 156
1	MR. LOCKE: Objection.	1	MR. ZELLERS: Objection. Form.
2	MR. ZELLERS: Form. Argumentative.	2	Misstates the evidence.
3	Misstates the evidence.	3	THE WITNESS: So this expert report was
4	(Mr. Meadows and Ms. Tucker conferring.)		the first time I consolidated or wrote an opinion
5	BY MR. MEADOWS:	5 6	regarding talc and ovarian cancer.
6	Q All right. While she's gathering that,	6	BY MR. MEADOWS:
7	I want to go back to something I asked you.	7	Q So the answer is "yes"?
8	Well, let me ask you this: Can your	8	A In a report.
9	methodology in critiquing experts and their	9	Q So the answer is "yes"?
10	methodology be replicated in some way?	10	A Well, I did the slide decks before.
11	A So say that one more time. I don't	11	Q Okay. You're talking about the slides
12	understand the question.	12	you did for the for the conferences?
13	Q Yeah, can your methodology be	13	A Correct.
14	replicated?	14	Q As far as a writing goes, as far as a
15	A Well, if someone were to evaluate the	15	something other than a PowerPoint presentation,
16	same issue, they'd probably come to the any	16	the only time you've ever written on the topic of
17	reasonable scientist would come to the same	17	talc and ovarian cancer is what you provided in
18	conclusion.	18	this case.
19	Q Any reasonable scientist would come to	19	A Correct.
20	the same conclusions that you've reached in your	20	Q I'm going to show you
21	report?	21	MR. MEADOWS: I want to mark these.
22	A So if you eval if you evaluate the	22	(Moore Exhibit No. 5 was marked
23	same dataset, they would come to the using the	23	for identification.)
24	established methodologies, they would come to the	24	BY MR. MEADOWS:
25	same conclusions because that's what the	25	Q I show you what I marked as here,
1	scientific data support.	1	let's give you this one Exhibit 5.
2	Q And where would they go to look and find	2	Dr. Longo, you criticize him, right?
3	out what that methodology is, that methodology	3	A I discuss
4	that you're using?	4	MR. ZELLERS: Objection. Form.
5	A So the methodology so now I'm	5	Go ahead.
6	confused. What methodology are we talking about?	6	THE WITNESS: I discuss his analyses.
7	Q Well, the methodology you used to	7	BY MR. MEADOWS:
8	critique everybody else.	8	O Well, it's more than a discussion.
9	A The methodology is is simply to look	9	You you criticize his methodology, right? You
10	at the method and see how it's generally accepted	10	say he's his methodology is all wrong, right?
11	in science today.	11	MR. ZELLERS: Objection. Form.
12	Q What let me ask you this: What	12	THE WITNESS: Well, if you want to
13	have you ever published on the issues of talc and	13	discuss it, we can look in
14	ovarian cancer?	14	BY MR. MEADOWS:
15	A I have not published in peer-reviewed	15	Q We will. My my question right now
16	literature, no.	16	is, you you will agree with me that you have
17	Q Have you ever published on anything	17	been critical of Dr. Longo's methodology, right?
18	pertaining to talc?	18	A So Dr. Longo's
19	A No, I have not.	19	Q You can't answer that one yes or no?
20	Q Have you ever published on anything	20	A Well, I'd have to look. I know we used
21	pertaining to ovarian cancer?	21	his data as a worst case assumption.
	A No, I have not.	22	Q Well, let's take a look at what his
22			
23	Q So the first time you ever wrote	23	qualifications are. You understand he's a
		23 24	qualifications are. You understand he's a materials scientist, right?
23	Q So the first time you ever wrote		=

	Page 158		Page 160
1	THE WITNESS: I'd have to see his CV.	1	Dr. Moore, you can answer the
2	BY MR. MEADOWS:	2	question
3	Q You don't know this? You don't know	3	BY MR. MEADOWS:
4	what his qualifications are?	4	Q We'll move on to the next question. The
5	A I I do not know what his degree is	5	report says what it says. We'll go with that.
6	in.	6	A Right. But you know
7	Q You don't know what degree Dr. Longo's	7	Q So you understand well, no, you
8	is, and you spend pages upon pages criticizing his	8	don't, because you don't know what his degree is
9	work. You don't even know what he's what his	9	in. So let's move on to the next one.
10	degree is in?	10	(Moore Exhibit No. 6 was marked
11	MR. ZELLERS: Objection. Form.	11	for identification.)
12	THE WITNESS: So again, I don't know	12	BY MR. MEADOWS:
13	that I go pages on pages criticizing his work.	13	Q I show you what I marked as Exhibit 6.
14	We'd have to go through that to demonstrate that,	14	Dr. Saed, now, you you're critical of
15	and I'd have to see his CV to to see what his	15	his work too, right?
16	actual degree is in. I understand what he did in	16	MR. ZELLERS: Objection. Form.
17	this matter.	17	THE WITNESS: So
18	BY MR. MEADOWS:	18	BY MR. MEADOWS:
19	Q Are you are you or are you not	19	Q Are you critical of Dr. Saed's work?
20	critical of Dr. Longo's work?	20	A I was trying to I was trying to
21	MR. ZELLERS: Objection. Form.	21	respond.
22	THE WITNESS: So my analysis takes his	22	Q Yeah, well, that "so" is
23	analysis as a worst case scenario.	23	MR. ZELLERS: Well, hold on now. Let's
24	BY MR. MEADOWS:	24	not argue with her. Let her respond.
25	Q What does that mean?	25	MR. MEADOWS: No, I "so" does not
	Page 159		Page 161
1	A Well, I don't so let's let's look	1	lead in is not an answer.
2	at my report what I did.	2	BY MR. MEADOWS:
3	Q No, I don't	3	Q It's real simple. Are you critical of
4	A No.	4	Dr. Saed's work in this case or not?
5	Q I'm not asking you to look at your	5	MR. LOCKE: Objection.
6	report. I'm asking you about your criticism of	6	MR. ZELLERS: Objection. Form.
7	Dr. Longo. Are you are you critical of his	7	You may answer the question.
8	work or not?	8	THE WITNESS: For Dr. Saed, I was
9	MR. ZELLERS: Okay. Objection. She's	9	critical of the methodology that he used.
10	entitled to answer your question and use what she	10	BY MR. MEADOWS:
11	needs to answer it.	11	Q That's a "yes" but without saying "yes,"
12	BY MR. MEADOWS:	12	right?
12 13	BY MR. MEADOWS: Q My question is, are you critical of	12 13	
			right?
13	Q My question is, are you critical of	13	right? MR. LOCKE: Objection.
13 14	Q My question is, are you critical of Dr. Longo's work or not?	13 14	right? MR. LOCKE: Objection. MR. ZELLERS: Objection. Argumentative.
13 14 15	Q My question is, are you critical of Dr. Longo's work or not? Dr. Moore, I asked you a question. Are	13 14 15	right? MR. LOCKE: Objection. MR. ZELLERS: Objection. Argumentative. BY MR. MEADOWS:
13 14 15 16	Q My question is, are you critical of Dr. Longo's work or not? Dr. Moore, I asked you a question. Are you critical	13 14 15 16	right? MR. LOCKE: Objection. MR. ZELLERS: Objection. Argumentative. BY MR. MEADOWS: Q Okay. So critical of Dr. Saed's work.
13 14 15 16 17	Q My question is, are you critical of Dr. Longo's work or not? Dr. Moore, I asked you a question. Are you critical A I understand.	13 14 15 16 17	right? MR. LOCKE: Objection. MR. ZELLERS: Objection. Argumentative. BY MR. MEADOWS: Q Okay. So critical of Dr. Saed's work. Now
13 14 15 16 17 18	Q My question is, are you critical of Dr. Longo's work or not? Dr. Moore, I asked you a question. Are you critical A I understand. Q of Dr. Longo's work or not?	13 14 15 16 17 18	right? MR. LOCKE: Objection. MR. ZELLERS: Objection. Argumentative. BY MR. MEADOWS: Q Okay. So critical of Dr. Saed's work. Now A Which I think I was critical of the
13 14 15 16 17 18	Q My question is, are you critical of Dr. Longo's work or not? Dr. Moore, I asked you a question. Are you critical A I understand. Q of Dr. Longo's work or not? A (Peruses document.) I just want to accurately reflect what I have in my report.	13 14 15 16 17 18 19	right? MR. LOCKE: Objection. MR. ZELLERS: Objection. Argumentative. BY MR. MEADOWS: Q Okay. So critical of Dr. Saed's work. Now A Which I think I was critical of the methods that Dr. Saed used.
13 14 15 16 17 18 19	Q My question is, are you critical of Dr. Longo's work or not? Dr. Moore, I asked you a question. Are you critical A I understand. Q of Dr. Longo's work or not? A (Peruses document.) I just want to	13 14 15 16 17 18 19 20	right? MR. LOCKE: Objection. MR. ZELLERS: Objection. Argumentative. BY MR. MEADOWS: Q Okay. So critical of Dr. Saed's work. Now A Which I think I was critical of the methods that Dr. Saed used. Q Now, unlike Dr. Longo, are you familiar
13 14 15 16 17 18 19 20 21	Q My question is, are you critical of Dr. Longo's work or not? Dr. Moore, I asked you a question. Are you critical A I understand. Q of Dr. Longo's work or not? A (Peruses document.) I just want to accurately reflect what I have in my report. Q You can't answer that question yes or no?	13 14 15 16 17 18 19 20 21	right? MR. LOCKE: Objection. MR. ZELLERS: Objection. Argumentative. BY MR. MEADOWS: Q Okay. So critical of Dr. Saed's work. Now A Which I think I was critical of the methods that Dr. Saed used. Q Now, unlike Dr. Longo, are you familiar with Dr. Saed's qualifications? A Again, I have not memorized these
13 14 15 16 17 18 19 20 21	Q My question is, are you critical of Dr. Longo's work or not? Dr. Moore, I asked you a question. Are you critical A I understand. Q of Dr. Longo's work or not? A (Peruses document.) I just want to accurately reflect what I have in my report. Q You can't answer that question yes or	13 14 15 16 17 18 19 20 21 22	right? MR. LOCKE: Objection. MR. ZELLERS: Objection. Argumentative. BY MR. MEADOWS: Q Okay. So critical of Dr. Saed's work. Now A Which I think I was critical of the methods that Dr. Saed used. Q Now, unlike Dr. Longo, are you familiar with Dr. Saed's qualifications?

41 (Pages 158 to 161)

	Page 162		Page 164
1	of expert he is?	1	reviewed their work as a scientist. So I looked
2	A Generally, yes, I do.	2	at the methods that they used, the results they
3	Q What is he?	3	obtained, as I would any scientific review.
4	A He studies ovarian cancer.	4	BY MR. MEADOWS:
5	Q Okay. So he he's an expert on	5	Q It makes no difference to you that
6	ovarian cancer, right?	6	Dr. Saed has 30-plus years of experience with an
7	MR. LOCKE: Objection.	7	emphasis on ovarian cancer?
8	MR. ZELLERS: Objection. Form,	8	MR. LOCKE: Objection.
9	foundation.	9	MR. ZELLERS: Objection. Form.
10	THE WITNESS: Well, again, I don't know	10	Foundation.
11	what he's he presents himself as an expert,	11	THE WITNESS: I think I've answered
12	yes, but but I don't know if this is accurate	12	that. But again, I evaluated the methods that
13	or not. I would have to see his CV. I don't know	13	they used.
14	where this came from.	14	BY MR. MEADOWS:
15	BY MR. MEADOWS:	15	Q Does it make any difference to you in
16	Q So you don't know how long he's been	16	your methodology that Dr. Saed has 30-plus years
17	had experience in with an emphasis on ovarian	17	of experience with an emphasis on ovarian cancer?
18	cancer?	18	MR. ZELLERS: Objection. Form,
19	MR. ZELLERS: Objection. Form.	19	argumentative, asked and answered.
20	THE WITNESS: I reviewed the methods	20	THE WITNESS: My analysis sorry.
21	that he used. Not his experience.	21	MR. ZELLERS: Go ahead.
22	BY MR. MEADOWS:	22	THE WITNESS: My analysis was on the
23	Q So it wasn't important to you as part of	23	methods that were used to to derive the
24	your methodology in critiquing these experts'	24	opinions in this case.
25	methodology to figure out the extent of their	25	BY MR. MEADOWS:
	Page 163		Page 165
1	expertise.	1	Q So it makes no difference to you that
2	MR. ZELLERS: Objection. Form.	2	Dr. Saed has 30-plus years of experience with an
3	THE WITNESS: So, again, I I	3	emphasis on ovarian cancer?
4	evaluated the methodology that was used.	4	MR. ZELLERS: Same objections.
5	BY MR. MEADOWS:	5	THE WITNESS: Again, my methods were
6	Q Okay. Well, this gets back to your		
	Q only. Wen, and gets offen to your	6	based or on evaluating the scientific methods
7	methodology of critiquing experts. I take it that	6 7	based or on evaluating the scientific methods that he that the experts used when they derived
7 8			
	methodology of critiquing experts. I take it that a part of your methodology in critiquing experts does not include assessing their degree of	7	that he that the experts used when they derived
8	methodology of critiquing experts. I take it that a part of your methodology in critiquing experts	7 8	that he that the experts used when they derived their opinions in this case. BY MR. MEADOWS: Q How many years of experience do you have
8 9	methodology of critiquing experts. I take it that a part of your methodology in critiquing experts does not include assessing their degree of expertise. Is that fair to say? MR. ZELLERS: Move to strike the	7 8 9	that he that the experts used when they derived their opinions in this case. BY MR. MEADOWS: Q How many years of experience do you have with an emphasis on ovarian cancer?
8 9 10	methodology of critiquing experts. I take it that a part of your methodology in critiquing experts does not include assessing their degree of expertise. Is that fair to say? MR. ZELLERS: Move to strike the statement of counsel. Objection. Form.	7 8 9 10	that he that the experts used when they derived their opinions in this case. BY MR. MEADOWS: Q How many years of experience do you have
8 9 10 11	methodology of critiquing experts. I take it that a part of your methodology in critiquing experts does not include assessing their degree of expertise. Is that fair to say? MR. ZELLERS: Move to strike the	7 8 9 10 11	that he that the experts used when they derived their opinions in this case. BY MR. MEADOWS: Q How many years of experience do you have with an emphasis on ovarian cancer?
8 9 10 11 12	methodology of critiquing experts. I take it that a part of your methodology in critiquing experts does not include assessing their degree of expertise. Is that fair to say? MR. ZELLERS: Move to strike the statement of counsel. Objection. Form.	7 8 9 10 11 12	that he that the experts used when they derived their opinions in this case. BY MR. MEADOWS: Q How many years of experience do you have with an emphasis on ovarian cancer? MR. ZELLERS: Objection. Form. Asked
8 9 10 11 12 13	methodology of critiquing experts. I take it that a part of your methodology in critiquing experts does not include assessing their degree of expertise. Is that fair to say? MR. ZELLERS: Move to strike the statement of counsel. Objection. Form. THE WITNESS: Can you repeat your	7 8 9 10 11 12 13	that he that the experts used when they derived their opinions in this case. BY MR. MEADOWS: Q How many years of experience do you have with an emphasis on ovarian cancer? MR. ZELLERS: Objection. Form. Asked and answered.
8 9 10 11 12 13 14	methodology of critiquing experts. I take it that a part of your methodology in critiquing experts does not include assessing their degree of expertise. Is that fair to say? MR. ZELLERS: Move to strike the statement of counsel. Objection. Form. THE WITNESS: Can you repeat your question? Sorry.	7 8 9 10 11 12 13 14	that he that the experts used when they derived their opinions in this case. BY MR. MEADOWS: Q How many years of experience do you have with an emphasis on ovarian cancer? MR. ZELLERS: Objection. Form. Asked and answered. THE WITNESS: So since I've been reading this literature or in general? BY MR. MEADOWS:
8 9 10 11 12 13 14 15	methodology of critiquing experts. I take it that a part of your methodology in critiquing experts does not include assessing their degree of expertise. Is that fair to say? MR. ZELLERS: Move to strike the statement of counsel. Objection. Form. THE WITNESS: Can you repeat your question? Sorry. BY MR. MEADOWS:	7 8 9 10 11 12 13 14 15	that he that the experts used when they derived their opinions in this case. BY MR. MEADOWS: Q How many years of experience do you have with an emphasis on ovarian cancer? MR. ZELLERS: Objection. Form. Asked and answered. THE WITNESS: So since I've been reading this literature or in general?
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8 9 10 11 12 13 14 15 16 17	methodology of critiquing experts. I take it that a part of your methodology in critiquing experts does not include assessing their degree of expertise. Is that fair to say? MR. ZELLERS: Move to strike the statement of counsel. Objection. Form. THE WITNESS: Can you repeat your question? Sorry. BY MR. MEADOWS: Q Well, I I still don't know what your methodology is, but I would assume from what you're saying that your methodology of going about	7 8 9 10 11 12 13 14 15 16 17	that he that the experts used when they derived their opinions in this case. BY MR. MEADOWS: Q How many years of experience do you have with an emphasis on ovarian cancer? MR. ZELLERS: Objection. Form. Asked and answered. THE WITNESS: So since I've been reading this literature or in general? BY MR. MEADOWS: Q Well, before you started working on litigation, how many years of experience do you
8 9 10 11 12 13 14 15 16 17 18	methodology of critiquing experts. I take it that a part of your methodology in critiquing experts does not include assessing their degree of expertise. Is that fair to say? MR. ZELLERS: Move to strike the statement of counsel. Objection. Form. THE WITNESS: Can you repeat your question? Sorry. BY MR. MEADOWS: Q Well, I I still don't know what your methodology is, but I would assume from what you're saying that your methodology of going about critiquing experts does not include determining	7 8 9 10 11 12 13 14 15 16 17 18	that he that the experts used when they derived their opinions in this case. BY MR. MEADOWS: Q How many years of experience do you have with an emphasis on ovarian cancer? MR. ZELLERS: Objection. Form. Asked and answered. THE WITNESS: So since I've been reading this literature or in general? BY MR. MEADOWS: Q Well, before you started working on litigation, how many years of experience do you have with an emphasis on ovarian cancer?
8 9 10 11 12 13 14 15 16 17 18 19 20	methodology of critiquing experts. I take it that a part of your methodology in critiquing experts does not include assessing their degree of expertise. Is that fair to say? MR. ZELLERS: Move to strike the statement of counsel. Objection. Form. THE WITNESS: Can you repeat your question? Sorry. BY MR. MEADOWS: Q Well, I I still don't know what your methodology is, but I would assume from what you're saying that your methodology of going about critiquing experts does not include determining the degree of expertise a particular expert has	7 8 9 10 11 12 13 14 15 16 17 18 19 20	that he that the experts used when they derived their opinions in this case. BY MR. MEADOWS: Q How many years of experience do you have with an emphasis on ovarian cancer? MR. ZELLERS: Objection. Form. Asked and answered. THE WITNESS: So since I've been reading this literature or in general? BY MR. MEADOWS: Q Well, before you started working on litigation, how many years of experience do you have with an emphasis on ovarian cancer? A So, what would you so I would say I
8 9 10 11 12 13 14 15 16 17 18 19 20 21	methodology of critiquing experts. I take it that a part of your methodology in critiquing experts does not include assessing their degree of expertise. Is that fair to say? MR. ZELLERS: Move to strike the statement of counsel. Objection. Form. THE WITNESS: Can you repeat your question? Sorry. BY MR. MEADOWS: Q Well, I I still don't know what your methodology is, but I would assume from what you're saying that your methodology of going about critiquing experts does not include determining the degree of expertise a particular expert has before you assess and critique his or her work.	7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	that he that the experts used when they derived their opinions in this case. BY MR. MEADOWS: Q How many years of experience do you have with an emphasis on ovarian cancer? MR. ZELLERS: Objection. Form. Asked and answered. THE WITNESS: So since I've been reading this literature or in general? BY MR. MEADOWS: Q Well, before you started working on litigation, how many years of experience do you have with an emphasis on ovarian cancer? A So, what would you so I would say I was evaluating the association with ovarian cancer
8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	methodology of critiquing experts. I take it that a part of your methodology in critiquing experts does not include assessing their degree of expertise. Is that fair to say? MR. ZELLERS: Move to strike the statement of counsel. Objection. Form. THE WITNESS: Can you repeat your question? Sorry. BY MR. MEADOWS: Q Well, I I still don't know what your methodology is, but I would assume from what you're saying that your methodology of going about critiquing experts does not include determining the degree of expertise a particular expert has before you assess and critique his or her work. Is that fair to say?	7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	that he that the experts used when they derived their opinions in this case. BY MR. MEADOWS: Q How many years of experience do you have with an emphasis on ovarian cancer? MR. ZELLERS: Objection. Form. Asked and answered. THE WITNESS: So since I've been reading this literature or in general? BY MR. MEADOWS: Q Well, before you started working on litigation, how many years of experience do you have with an emphasis on ovarian cancer? A So, what would you so I would say I was evaluating the association with ovarian cancer for probably a year-ish before I was involved in

	Page 166		Page 168
1	THE WITNESS: So one is not near 30, I	1	want her to answer? I'm sorry.
2	would agree.	2	BY MR. MEADOWS:
3	BY MR. MEADOWS:	3	Q Is Health Canada referenced in your
4	Q Okay. Well, we found something we could	4	report?
5	agree on, huh?	5	A The Health Canada draft screening
6	MR. ZELLERS: Okay. That's a statement,	6	assessment was not referenced in my report.
7	not a question.	7	Q But you are now you have now made
8	(Counsel conferring.)	8	reference to it in the list that was provided to
9	BY MR. MEADOWS:	9	me by your lawyers last night. Is that what
10	Q All right. So the next thing I want to	10	you're telling me?
11	do is go on down: "My primary opinions regarding	11	A So the list that I created of all the
12	potential adverse health effects from exposure to	12	materials that I reviewed, that was provided to
13	Johnson's Baby Powder and Shower to Shower talcum	13	you last night, doesn't include Health Canada.
14	powder products are as follows," the first one,	14	Q So let's look at Health Canada
15	number 1: "Cosmetic talc. The scientific	15	(Moore Exhibit No. 7 was marked
16	literature does not support a causal relationship	16	for identification.)
17	between perineal talc use and ovarian cancer."	17	BY MR. MEADOWS:
18	Did I read that right?	18	Q marked as Exhibit 7.
19	A You did read that correctly.	19	All right. You got it, Exhibit 7 there?
20	Q All right. So, now, we know that when	20	A I do.
21	you wrote this, you didn't consider the Health	21	Q Are you familiar with this?
22	Canada publication, did you?	22	A I have seen this.
23	MR. MORIARTY: I'm sorry. Could you	23	Q You have seen this. Okay.
24	repeat that, please?	24	When did you first see this?
25	BY MR. MEADOWS:	25	A Probably December or January in this
	Page 167		Page 169
1	Q I said we know that when you wrote this	1	last December 2018, January 2019.
2	report that you didn't consider the Health Canada	2	Q Okay. So you saw it before you wrote
3	publication, did you?	3	and signed your report, right?
4	A Well, I read the Health Canada	4	A Correct. January was before February,
5	publication but did not include that in my report.	5	when I signed my report.
6	Q Okay. Is that referenced in the	6	Q And yet it's not referenced anywhere in
7	materials you provided?	7	your report, is it?
8	A Yes. I believe so, yes.	8	A That's correct.
9	Q So somewhere in your expert report it	9	Q But at some point in time, it became
10	said it references Health Canada?	10	important enough to you to include it on the list
11	A So that's in the complete list of	11	that you provided to us last night, right?
12	materials.	12	MR. LOCKE: Objection.
13	Q The complete list.	13	MR. ZELLERS: Objection. Form.
14	A The complete list that we talked about	14	THE WITNESS: So so the so my
15	earlier today.	15	report contains all the references that I cited.
16	Q Oh, the one that I got last night.	16	This list considers everything that I also
17	A That I that's what you said when you	17	considered but didn't cite. It's a complete list
18	got it, yeah.	18	of references.
	Q Yeah. So that was not in the materials	19	BY MR. MEADOWS:
19		1 00	Q Right. To be clear, Health Canada again
19 20	that you apparently well, that you provided	20	Q Tright. To be clear, Health Canada again
	that you apparently well, that you provided with your report. I didn't see where you cited to		
20	with your report. I didn't see where you cited to	20 21 22	was not cited to or referenced in your report,
20 21	with your report. I didn't see where you cited to Health Canada in your report anywhere. Am I wrong	21	was not cited to or referenced in your report, correct?
20 21 22	with your report. I didn't see where you cited to Health Canada in your report anywhere. Am I wrong about that?	21 22	was not cited to or referenced in your report, correct? A The draft screening assessment that was
20 21 22 23	with your report. I didn't see where you cited to Health Canada in your report anywhere. Am I wrong	21 22 23	was not cited to or referenced in your report, correct?

1	Page 170		Page 172
1	Q But you were aware of it at the time you	1	MR. ZELLERS: Objection. Form.
2	signed your report, correct?	2	THE WITNESS: Okay. So those
3	A I was aware of it, yes.	3	BY MR. MEADOWS:
4	Q Okay. I want to flip over to page 28.	4	Q Is that what it says?
5	And again, your report says:	5	A Those words are written in this draft
6	"Scientific literature does not support a causal	6	screening assessment.
7	relationship between perineal talc use and ovarian	7	Q Okay. So what you said in your report
8	cancer." Right?	8	is not correct, is it?
9	MR. ZELLERS: Okay. Objection. You	9	MR. LOCKE: Objection.
10	said her report. Is that what you meant?	10	MR. ZELLERS: Objection. Form.
11	MR. MEADOWS: Yeah, that's what I'm	11	THE WITNESS: So what I said in my
12	looking at here on the screen, her again, her	12	report is correct, according to the scientific
13	report.	13	literature.
14	MR. ZELLERS: Okay.	14	BY MR. MEADOWS:
15	BY MR. MEADOWS:	15	Q "Scientific literature does not support
16	Q Your report, Dr. Moore.	16	a causal relationship between perineal talc use
17	MR. ZELLERS: I apologize, Counsel.	17	and ovarian cancer."
18	BY MR. MEADOWS:	18	Are you saying that Health Canada is not
19	Q It's on the screen right there. It	19	scientific literature?
20	says: "Scientific literature does not support a	20	A So I'm saying that what I did was
21	causal relationship between perineal talc use and	21	different than what Health Canada did.
22	ovarian cancer."	22	Q Okay. Now, I'm asking you you wrote
23	That's what you said in February of	23	this sentence, right?
24	2019, correct?	24	"Scientific literature does not support
25	A Correct.	25	a causal relationship between perineal talc use
	Page 171		Page 173
1	Q Exhibit 7, Health Canada came out in	1	and ovarian cancer?" You wrote that, right?
2	December 2018, and you said you were aware of	2	A I did write that.
3	it		
	ιι	3	Q And Health Canada you knew at the
4	A That is correct.	3 4	time you wrote that that Health Canada had found a
4 5	A That is correct.Q shortly after it came out and before		time you wrote that that Health Canada had found a causal effect, right?
	A That is correct. Q shortly after it came out and before you wrote your report, right?	4	time you wrote that that Health Canada had found a
5	A That is correct. Q shortly after it came out and before you wrote your report, right? A While I was writing my report, yes.	4 5	time you wrote that that Health Canada had found a causal effect, right? MR. ZELLERS: Excuse me. Objection. Form. Foundation.
5 6	A That is correct. Q shortly after it came out and before you wrote your report, right? A While I was writing my report, yes. Q Okay. So Health Canada says: "The meta	4 5 6	time you wrote that that Health Canada had found a causal effect, right? MR. ZELLERS: Excuse me. Objection.
5 6 7	A That is correct. Q shortly after it came out and before you wrote your report, right? A While I was writing my report, yes. Q Okay. So Health Canada says: "The meta analyses of the available human studies in the	4 5 6 7	time you wrote that that Health Canada had found a causal effect, right? MR. ZELLERS: Excuse me. Objection. Form. Foundation. THE WITNESS: So I don't believe that I think you misstated what Health Canada found.
5 6 7 8	A That is correct. Q shortly after it came out and before you wrote your report, right? A While I was writing my report, yes. Q Okay. So Health Canada says: "The meta analyses of the available human studies in the peer-reviewed literature indicate a consistent and	4 5 6 7 8	time you wrote that that Health Canada had found a causal effect, right? MR. ZELLERS: Excuse me. Objection. Form. Foundation. THE WITNESS: So I don't believe that I think you misstated what Health Canada found. And I based my studies, my whole assessment based
5 6 7 8 9	A That is correct. Q shortly after it came out and before you wrote your report, right? A While I was writing my report, yes. Q Okay. So Health Canada says: "The meta analyses of the available human studies in the peer-reviewed literature indicate a consistent and statistically significant positive association	4 5 6 7 8 9 10	time you wrote that that Health Canada had found a causal effect, right? MR. ZELLERS: Excuse me. Objection. Form. Foundation. THE WITNESS: So I don't believe that I think you misstated what Health Canada found. And I based my studies, my whole assessment based on the scientific dataset that's available today.
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5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A That is correct. Q shortly after it came out and before you wrote your report, right? A While I was writing my report, yes. Q Okay. So Health Canada says: "The meta analyses of the available human studies in the peer-reviewed literature indicate a consistent and statistically significant positive association between perineal exposure to talc and ovarian cancer. Further, available data are indicative of a causal effect." Did I read that correct? A You did read that correctly. Q "Given that there is the potential for perineal exposure to talc from the use of various self-care products, a potential concern for human health has been identified." Did I read that correctly? A You have read that correctly.	4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	time you wrote that that Health Canada had found a causal effect, right? MR. ZELLERS: Excuse me. Objection. Form. Foundation. THE WITNESS: So I don't believe that I think you misstated what Health Canada found. And I based my studies, my whole assessment based on the scientific dataset that's available today. BY MR. MEADOWS: Q Well, Health Canada was available when you wrote this, right? A Health Canada is not a scientific study. Q Oh, okay. So you say Health Canada is not a scientific study. A So Health Canada is an assessment that was done. It's a draft. It's based on a publication that has not been accepted for peer review, so it's a prepublication, is the basis for a lot of the opinions that are expressed in this

	Page 174		Page 176
1	A That's not what I said. The Taher	1	draft assessment based on a publication that's not
2	article, the manuscript that this is based on, I	2	been published. It's based on methodology that
3	don't know if it's been peer-reviewed or not.	3	was perhaps different than mine.
4	Q You don't know if Taher has been	4	BY MR. MEADOWS:
5	peer-reviewed?	5	Q So you didn't even take a take it
6	A That's correct.	6	into account in your analysis, right?
7	Q Okay. You just don't as you sit here	7	A So this was a different analysis. It's
8	today whether	8	a draft publication. I didn't think it was
9	MR. LOCKE: Objection.	9	it pertinent because it's a draft based on an
10	BY MR. MEADOWS:	10	unpeer-reviewed source.
11	Q Taher has been peer-reviewed.	11	Q You keep using the word "draft." You do
12	MR. ZELLERS: Objection. Form.	12	understand that the government of Canada has now
13	THE WITNESS: So I base my scientific	13	started issuing warnings to the public about the
14	opinions on scientific knowledge that is that	14	dangers of genital talc use.
15	is known. I didn't have access to the Taher	15	MR. ZELLERS: Objection.
16	publication until the supplemental materials	16	BY MR. MEADOWS:
17	until after the publication until after I wrote	17	Q Are you aware of that?
18	my report. So I couldn't even assess what Taher	18	MR. ZELLERS: Objection. Form,
19	had done.	19	foundation.
20	BY MR. MEADOWS:	20	THE WITNESS: I'm not aware.
21	Q At the end of the day, why didn't you	21	BY MR. MEADOWS:
22	include Health Canada in that sentence in some	22	Q I mean, they're not considering this a
23	way, shape or form, even it was to put a footnote	23	draft. They they have decided that the public
24	or asterisks? Because it clearly says "causal,"	24	needs to know about this risk. Are you aware of
25	doesn't it?	25	that?
23	doesn't it.	25	uiat?
	Page 175		Page 177
1	Page 175 A Well	1	Page 177 MR. ZELLERS: Objection. Form,
1 2		1 2	
	A Well		MR. ZELLERS: Objection. Form,
2	A Well MR. ZELLERS: Go ahead.	2	MR. ZELLERS: Objection. Form, foundation.
2 3	A Well MR. ZELLERS: Go ahead. THE WITNESS: that word is in the	2 3	MR. ZELLERS: Objection. Form, foundation. THE WITNESS: Again, I'm aware of the conclusions that it says "may or may not." BY MR. MEADOWS:
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45 (Pages 174 to 177)

	Page 178		Page 180
1	MR. ZELLERS: What number are we on?	1	A No, I do not.
2	MS. TUCKER: 8.	2	Q Do you know what their qualifications
3	MR. ZELLERS: 8? Thank you.	3	are, all these people?
4	(Moore Exhibit No. 8 was marked	4	A No, I do not.
5	for identification.)	5	Q But that wasn't important to you as far
6	BY MR. MEADOWS:	6	as your methodology in criticizing their work,
7	Q All right. I've given you what I marked	7	right?
8	as Exhibit 8.	8	MR. ZELLERS: Objection.
9	Are you familiar with that?	9	BY MR. MEADOWS:
10	A (Peruses document.)	10	Q It didn't make any difference to you
11	I haven't seen the published form, but I	11	what the degree of expertise they have, right?
12	believe this is the Saed manuscript that I	12	MR. ZELLERS: Objection. Form.
13	reviewed.	13	THE WITNESS: So, again, I criticized
14	Q Okay. This is the one that you're	14	the methodology that was used.
15	critical of, right?	15	BY MR. MEADOWS:
16	MR. ZELLERS: Objection. Form.	16	Q And as a part of your methodology, you
17	THE WITNESS: So I was critical of the	17	don't look at what another expert's qualifications
18	methodology that was used to generate the this	18	are, do you?
19	data.	19	MR. ZELLERS: Objection. Form, asked
20	BY MR. MEADOWS:	20	and answered.
21	Q Have you written a letter to the editor	21	THE WITNESS: So method and scientific
22	of this journal telling them that the methodology	22	data stand on their own.
23	is all screwed up?	23	BY MR. MEADOWS:
24	A I have not.	24	Q So that's a yes, I don't look at
25	Q Are you planning on doing that?	25	qualifications, right?
	Q 1110 you planning on doing that		4
	Page 179		Page 181
1	Page 179 A I haven't thought about it.	1	Page 181 MR. ZELLERS: Objection. Form.
1 2		1 2	
	A I haven't thought about it.		MR. ZELLERS: Objection. Form.
2	A I haven't thought about it. Q No?	2	MR. ZELLERS: Objection. Form. THE WITNESS: Well, it's a pretty
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1	"These findings are the first to confirm the	1	talc does not is not causally linked to ovarian
2	cellular effect of talc and provide a molecular	2	cancer.
3	mechanism to previous reports linking genital	3	BY MR. MEADOWS:
4	talc use genital use to increased ovarian	4	Q Okay. But your your statement here
5	cancer risk."	5	is a little different. It says: "Scientific
6	Did I read that correctly?	6	literature does not support a causal relationship
7	A I believe so, yes, you read that	7	between perineal talc use and ovarian cancer."
8	correctly.	8	A That's right.
9	Q So that alone disproves your statement,	9	Q So you're just saying you can't even
10	doesn't it?	10	take that one into consideration. That that Saed
11	MR. LOCKE: Objection.	11	study, we're not even going to consider it.
12	BY MR. MEADOWS:	12	MR. ZELLERS: Hold on. Objection.
13	Q "Scientific literature does not support	13	Form, misstates her testimony.
14	a causal relationship between perineal talc use	14	THE WITNESS: So that's not what I said.
15	and ovarian cancer."	15	BY MR. MEADOWS:
16	MR. LOCKE: Objection.	16	Q Okay. Well, we know we we know you
17	MR. ZELLERS: Objection. Form.	17	didn't consider Health Canada. Right?
18	THE WITNESS: So the sentence that you	18	MR. ZELLERS: Objection.
19	read from this individual paper is perhaps out of	19	THE WITNESS: That's not what I said.
20	context. You have to evaluate so from for	20	BY MR. MEADOWS:
21	me, I evaluated the notebooks and the data that	21	Q Well, it's not in your report, is it?
22	created these results. So I that does not	22	A It's a draft assessment that's based its
23	disprove my opinion that scientific data do not	23	its findings on an unpublished source. I did
24	support that talc is a cause of ovarian cancer.	24	not include that in my report.
25	BY MR. MEADOWS:	25	Q Right. And then as far as Saed goes,
	Page 183		Page 185
			3
1	Q Well, let's flip over and just see if	1	you talk about Saed and talk about his methodology
1 2	see if maybe this changes your mind. Flip over to	1 2	you talk about Saed and talk about his methodology and saying that it's wrong, but you don't take
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	Page 186		Page 188
1	THE WITNESS: I don't know what	1	Q Are you aware that Dr. Saed's talcum
2	MR. ZELLERS: Hold on, please. Excuse	2	powder research has been presented at at least
3	me.	3	three national scientific meetings?
4	THE WITNESS: Sorry.	4	MR. ZELLERS: Objection. Form,
5	MR. ZELLERS: Objection. Form,	5	foundation.
6	foundation.	6	THE WITNESS: No. I I knew at least
7	Go ahead.	7	one. I didn't know how many.
8	THE WITNESS: So I don't know what you	8	BY MR. MEADOWS:
9	mean by "repute reputable journal."	9	Q Going back to your answer regarding
10	BY MR. MEADOWS:	10	having performed studies on the biological effects
11	Q Okay. All right.	11	of particles, were any of those published?
12	On the subject of Dr. Saed, are you	12	A So those were National Toxicology
13	aware how many published articles he has on the	13	studies. They wouldn't have been in peer-reviewed
14	issues related to oxidative stress and ovarian	14	literature, no.
15	cancer?	15	Q I missed the end of that.
16	A I do not know.	16	A They would not have been in peer-
17	Q Have you performed any in vitro	17	reviewed literature. They're just generated
18	laboratory research relating to ovarian cancer?	18	study internal study reports.
19	A I have not.	19	Q Have you presented any research on
20	Q Have you published any studies relating	20	ovarian cancer or related topics at national
21	to the molecular basis of ovarian cancer?	21	scientific meetings?
22	A I have not.	22	A No. Except for the the presentations
23	Q Have you published any article that even	23	that we discussed earlier.
24	has "ovarian cancer" in the title?	24	Q Okay. Do you consider those national
25	A No, I have not.	25	scientific meetings?
	Page 187		Page 189
1	Q Have you performed any in vitro	1	A Well, the AIHce, the American Industrial
2	laboratory research relating to the type to any	2	Hygiene Conference and Expo is the annual meeting
3	type of cancer?	3	of industrial hygienists.
4	A So I think the answer to that is no.	4	Q Okay. So one.
5		5	A Correct.
6	Q Good enough. A Yeah.	6	Q Have you submitted any proposals for
7		7	molecular studies to J&J?
8	Q Have you ever performed any studies on the biological effects of particles?	8	A I have not.
9	A Yes.	9	Q Has J&J asked you to perform any
10	Q Tell me about those.	10	molecular studies on talcum powder and ovarian
11		11	cancer?
12	A So inhalation studies of particulate matter.	12	A No.
13 14	Q Have you ever performed any studies	13 14	Q Have you ever reviewed any articles for any journal on the topic of ovarian cancer?
15	relating to the role of oxidative stress and cancer?	15	A No.
16		16	
	A So I've performed studies on test	17	
17 18	articles related to the propensity to cause	18	cancer, are you?
	cancer, and some of those may have been related to		MR. ZELLERS: Objection. Form.
19	oxidative stress.	19	THE WITNESS: So I'm an expert in
20 21	Q Have you published any articles related	20	toxicology, and as a toxicologist, we study all
. / 1	to relating to the molecular basis for any type of cancer?	21 22	kind all kinds of cancers, including ovarian
	OL CAUCEL?	44	cancer.
22		22	DV MD MEADOWS.
22 23	A I hesitate because I'm not sure if some	23	BY MR. MEADOWS:
22		23 24 25	BY MR. MEADOWS: Q You're not qualified to critique the work of a molecular biologist, are you?

48 (Pages 186 to 189)

	Page 190		Page 192
1	MR. ZELLERS: Objection. Form,	1	THE WITNESS: I don't know what he did
2	foundation.	2	to the reviewers.
3	THE WITNESS: I am qualified to review	3	BY MR. MEADOWS:
4	methodology.	4	Q Well, now, if a there's a fraud going
5	BY MR. MEADOWS:	5	on here, you're going to report it, aren't you?
6	Q My question was, you're not qualified to	6	MR. ZELLERS: Okay. Objection.
7	critique the work of a molecular biologist, are	7	Argumentative.
8	you?	8	THE WITNESS: So so I don't know that
9	MR. ZELLERS: Objection. Form.	9	it's fraud or misrepresentation.
10	THE WITNESS: No, as a toxicologist, I	10	BY MR. MEADOWS:
11	can I am qualified to critique molecular	11	Q All right. Are you going to report this
12	biology experimentations, especially as they	12	to the reviewers, your findings that this
13	relate to the field of toxicology.	13	methodology is flawed?
14	BY MR. MEADOWS:	14	MR. ZELLERS: Okay. Objection.
15	Q Do you have any reason to believe that	15	Argumentative.
16	this article by Fletcher and Saed and others,	16	THE WITNESS: I have I had not
17	Exhibit 8, was not peer-reviewed?	17	considered that.
18	A No, I I believe this article was	18	BY MR. MEADOWS:
19	peer-reviewed.	19	Q Okay. Well, I'm asking you now, are you
20	Q Are you aware of any of the peer	20	going to are you going to do it?
21	reviewers stating that the methodology was flawed?	21	MR. ZELLERS: Okay. Objection. Form,
22	A I have read the reviewers' comments. I	22	argumentative.
23	don't believe that that they issued those same	23	THE WITNESS: Again, I I'd have to
24	concerns.	24	think about that issue.
25	Q You mean your concerns.	25	BY MR. MEADOWS:
	Page 191		Page 193
1	A Well		
	A Well	1	Q Well, how long have you been aware that
2	MR. ZELLERS: Objection. Foundation.	1 2	Q Well, how long have you been aware that his methodologies were flawed?
2			his methodologies were flawed? A I don't know the exact time frame, but
	MR. ZELLERS: Objection. Foundation.	2	his methodologies were flawed?
3	MR. ZELLERS: Objection. Foundation. Go ahead.	2 3	his methodologies were flawed? A I don't know the exact time frame, but certainly before this report was issued. Q Are you aware of any criticisms that the
3 4	MR. ZELLERS: Objection. Foundation. Go ahead. THE WITNESS: So I reviewed Dr. Saed's	2 3 4	his methodologies were flawed? A I don't know the exact time frame, but certainly before this report was issued.
3 4 5	MR. ZELLERS: Objection. Foundation. Go ahead. THE WITNESS: So I reviewed Dr. Saed's notebooks, not his manu and and then later	2 3 4 5	his methodologies were flawed? A I don't know the exact time frame, but certainly before this report was issued. Q Are you aware of any criticisms that the
3 4 5 6	MR. ZELLERS: Objection. Foundation. Go ahead. THE WITNESS: So I reviewed Dr. Saed's notebooks, not his manu and and then later his manuscript.	2 3 4 5 6	his methodologies were flawed? A I don't know the exact time frame, but certainly before this report was issued. Q Are you aware of any criticisms that the reviewers had about his work?
3 4 5 6 7	MR. ZELLERS: Objection. Foundation. Go ahead. THE WITNESS: So I reviewed Dr. Saed's notebooks, not his manu and and then later his manuscript. BY MR. MEADOWS: Q Okay. So you're aware that the peer reviewers did not find any method	2 3 4 5 6 7	his methodologies were flawed? A I don't know the exact time frame, but certainly before this report was issued. Q Are you aware of any criticisms that the reviewers had about his work? A So I'd have to go back and see those documents. Q So as you sit here today, you don't
3 4 5 6 7 8	MR. ZELLERS: Objection. Foundation. Go ahead. THE WITNESS: So I reviewed Dr. Saed's notebooks, not his manu and and then later his manuscript. BY MR. MEADOWS: Q Okay. So you're aware that the peer reviewers did not find any method methodological flaws in his work, correct?	2 3 4 5 6 7 8	his methodologies were flawed? A I don't know the exact time frame, but certainly before this report was issued. Q Are you aware of any criticisms that the reviewers had about his work? A So I'd have to go back and see those documents. Q So as you sit here today, you don't recall the reviewers saying things like:
3 4 5 6 7 8 9 10	MR. ZELLERS: Objection. Foundation. Go ahead. THE WITNESS: So I reviewed Dr. Saed's notebooks, not his manu and and then later his manuscript. BY MR. MEADOWS: Q Okay. So you're aware that the peer reviewers did not find any method methodological flaws in his work, correct? MR. ZELLERS: Objection. Form.	2 3 4 5 6 7 8 9 10	his methodologies were flawed? A I don't know the exact time frame, but certainly before this report was issued. Q Are you aware of any criticisms that the reviewers had about his work? A So I'd have to go back and see those documents. Q So as you sit here today, you don't recall the reviewers saying things like: "Overall, this is a well-written manuscript and
3 4 5 6 7 8 9 10 11	MR. ZELLERS: Objection. Foundation. Go ahead. THE WITNESS: So I reviewed Dr. Saed's notebooks, not his manu and and then later his manuscript. BY MR. MEADOWS: Q Okay. So you're aware that the peer reviewers did not find any method methodological flaws in his work, correct? MR. ZELLERS: Objection. Form. MR. LOCKE: Objection.	2 3 4 5 6 7 8 9 10 11	his methodologies were flawed? A I don't know the exact time frame, but certainly before this report was issued. Q Are you aware of any criticisms that the reviewers had about his work? A So I'd have to go back and see those documents. Q So as you sit here today, you don't recall the reviewers saying things like: "Overall, this is a well-written manuscript and conclusions are supported by the results.
3 4 5 6 7 8 9 10 11 12	MR. ZELLERS: Objection. Foundation. Go ahead. THE WITNESS: So I reviewed Dr. Saed's notebooks, not his manu and and then later his manuscript. BY MR. MEADOWS: Q Okay. So you're aware that the peer reviewers did not find any method methodological flaws in his work, correct? MR. ZELLERS: Objection. Form. MR. LOCKE: Objection. MR. ZELLERS: Foundation.	2 3 4 5 6 7 8 9 10 11 12	his methodologies were flawed? A I don't know the exact time frame, but certainly before this report was issued. Q Are you aware of any criticisms that the reviewers had about his work? A So I'd have to go back and see those documents. Q So as you sit here today, you don't recall the reviewers saying things like: "Overall, this is a well-written manuscript and conclusions are supported by the results. "The current in vitro study does provide
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H. Nadia Moore, Ph.D.

	Page 194		Page 196
1	You're not aware of any of that?	1	And as I understood it, your hourly rate
2	MR. LOCKE: Objection.	2	is \$400 an hour, right?
3	MR. ZELLERS: Objection. Form.	3	A It is.
4	THE WITNESS: Generally I'm aware of the	4	Q So are there others who were working
5	reviewers' comments. I'm aware of the first	5	during that time period that had a higher rate
6	rejection. I'm aware that the second one was	6	that would bring the average up?
7	accepted.	7	A So the average
8	Beyond that, if you want to talk about	8	Q Yeah, the average for for a period of
9	individual comments, we could pull them out and	9	time, there were times when your your average
10	look at them to determine which ones are pertinent	10	was higher than \$400 an hour. So it tells me that
11	to the task at hand.	11	somebody was doing work that charges in excess of
12	BY MR. MEADOWS:	12	\$400 an hour.
13	Q Do you believe Dr. Saed to be	13	A Okay.
14	incompetent?	14	Q Who was it?
15	MR. ZELLERS: Objection. Form.	15	A I don't know who it was specifically. I
16	THE WITNESS: I don't know Dr. Saed.	16	know that Bruce Kelman or Dr. Kelman helped me
17	BY MR. MEADOWS:	17	in the beginning of the project.
18	Q Do you believe he's dishonest?	18	Q Dr. Kelman, you referred to him earlier?
19	MR. ZELLERS: Objection. Form.	19	A Correct. He's the president of Veritox
20	THE WITNESS: Again, I don't know	20	as well as a principal toxicologist.
21	Dr. Saed. I don't know who wrote the article.	21	Q He was the one who was invited to speak,
22	All I can tell you is the that the methods were	22	and you went in his place.
23	flawed.	23	A He was the one who the invitation was
24	BY MR. MEADOWS:	24	offered, yes.
25	Q Explain what was flawed.	25	Q Okay. And then there are so what is
	Explain what was hawed.		Q Okay. This their there are so what is
	Page 195		Page 197
1	A So	1	Dr. Kelman's rate?
2	Q Well, let me ask you this in the	2	A I don't know.
3	interest of time: Have you thoroughly explained	3	Q You don't know. And did he do any work
4	your criticisms in your report regarding Dr. Saed?	4	in 2019 on this?
5	A I believe there are criticisms that are	5	A I don't I don't know. He probably
6	thoroughly explained in my report.	6	did some work in 2019.
7	Q Okay.	7	Q There are other time periods where the
8	MR. MEADOWS: All right. Y'all want to	8	average is less than \$400 an hour, which leads me
9	take our break for lunch?	9	to believe that there were other people working on
10	MR. ZELLERS: It's your show.	10	it who charge a little lesser or lower rate. Who
11	THE VIDEOGRAPHER: The time is 1:23 p.m.	11	were those people?
12	We're going off the record.	12	A So those people included Jennifer
13	(Lunch recess.)	13	Hobden.
14	THE VIDEOGRAPHER: The time is 2:16 p.m.	14	Q Jennifer
15	We're back on the record.	15	A Hobden.
16	BY MR. MEADOWS:	16	Q Hobden.
17	Q Dr. Moore, I want to go back to your	17	A Yeah, Jennifer, and then H-O-B-D-E-N.
, <i></i>	billing statements.	18	Q Yeah. Okay.
18		1 10	A Lara Diener, L
	A Okay.	19	
18		20	
18 19	A Okay.		Q You mentioned her earlier.
18 19 20	A Okay.Q Do you have them?A I do.	20	Q You mentioned her earlier.A Right.
18 19 20 21	A Okay.Q Do you have them?A I do.	20 21	Q You mentioned her earlier.A Right.Q Okay. Who else?
18 19 20 21 22	A Okay.Q Do you have them?A I do.Q Somebody helped me out with a little bit	20 21 22	Q You mentioned her earlier.A Right.Q Okay. Who else?

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	Page 198		Page 200
1	A Probably Rebecca Ticknor.	1	A I missed the last
2	Q Yeah.	2	O Jonathan Borak.
3	A And there's probably some others that	3	A No, I don't know him.
4	helped with literature citation checks and things.	4	Q Brooke Mossman?
5	Q Okay. To be clear, I want to I can't	5	A No. Again, I know know her name, but
6	remember how I've asked this or whether I've asked	6	I don't know her personally.
7	it the right way, but I want to make sure I'm	7	Q Okay. Let's go back to your report. I
8	clear on my understanding of your whether	8	would like to flip over to page 22.
9	you've done any testing involving talc.	9	Give me a minute. I'm a little lost on
10	Have you ever done any testing involving	10	where I don't think I'm pointing you in the
11	tale?	11	right direction.
12	A So by testing, you mean	12	(Counsel conferring.)
13	Q Lab tests.	13	BY MR. MEADOWS:
14	A Laboratory-based testing?	14	Q Forget about that page. If you disagree
15	Q Yes.	15	with what I have written down as a quote from your
16	A No, I have not.	16	report, then we'll go hunting for it.
17	Q And that would include cell testing,	17	But I have a note here that in your
18	microscopic analysis, any any type of testing.	18	report, you say: "Johnson's Baby Powder and
19	I just want to make sure I'm not missing anything	19	Shower to Shower have not been shown to contain
20	here.	20	asbestos fibers."
21	A I have not tested talc in a laboratory	21	Does that sound familiar? Am I or do
22	setting.	22	we need to hunt this down?
23	Q Okay. Have you had any communications	23	A You probably need to hunt that down.
24	with other experts in the talc litigation?	24	
25	A No.	25	Q Okay. MR. MEADOWS: Have you got it?
	71 110.		Mic. MEXIDO WS. Thave you got it.
	Page 199		Page 201
1	Q Do you know who any of them are?	1	BY MR. MEADOWS:
2	A I know their names.	2	Q Go to page 19.
3	Q How do you know their names?	3	A Okay.
4	A From seeing them in this talc	4	Q I'll highlight it for you.
5	litigation, and some of them I I knew the names	5	See where I'm talking about?
6	beforehand.	6	A I do.
7	Q Did you do you know any of the	7	Q You agree you wrote that?
8	experts involved in this litigation well, do	8	A I wrote that.
9	you know any of them personally?	9	Q What's your base basis for that
10	A Personally, to walk up and say hello?	10	statement?
11	Q Yes.	11	A That they have not been shown to contain
12	A No.	12	asbestos fibers.
13	Q Have you ever met any of them before?	13	Q What's your basis for the statement:
14	A I think I may have met Dr. Zelikoff, but	14	"Johnson's Baby Powder and Shower to Shower have
15	I'm not sure.	15	not been shown to contain asbestos fibers"?
16	Q Where would that have been if you think	16	A The scientific dataset does not support
17	it happened?	17	that asbestos fibers have been found in Johnson's
18	A At the Society of Toxicology annual	18	Baby Powder and Shower to Shower products.
19	meetings.	19	Q Have you seen internal documents from
	Q Do you know Ann Wylie?	20	Johnson & Johnson involving the testing of talc
20	Q Do you know that wylie.	1	
20 21		21	for asbestos?
	A No. I know the name, but I don't know	21 22	
21	A No. I know the name, but I don't know her personally.		for asbestos? A I probably have. Q You probably have?
21 22	A No. I know the name, but I don't know her personally. Q Kelly Tuttle?	22	A I probably have.
21 22 23	A No. I know the name, but I don't know her personally. Q Kelly Tuttle?	22 23	A I probably have.Q You probably have?

51 (Pages 198 to 201)

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	Page 202		Page 204
1	about them in specifics, we can go through those	1	mineralogy reports. But that's what I meant by
2	materials.	2	that statement.
3	Q Have you seen positive results in those	3	Q True or false, Dr. Moore is not an
4	documents?	4	expert in geology or mineralogy?
5	MR. ZELLERS: Objection. Form, vague.	5	MR. ZELLERS: Objection. Form. Asked
6	THE WITNESS: Positive results, meaning?	6	and answered.
7	BY MR. MEADOWS:	7	THE WITNESS: So again, I would say the
8	Q For asbestos.	8	same response, which is that toxicology
9	A So it depends how you define "asbestos."	9	encompasses a lot of different disciplines that we
10	Q How do you define "asbestos"?	10	use as tools for the practice of toxicology. One
11	A Asbestos would be one of the six	11	of those is understanding the basics of mineralogy
12	regulated minerals that I I have in my report	12	and geology in applying expert opinions.
13	listed.	13	BY MR. MEADOWS:
14	Q Okay. So have you seen positive results	14	Q It sounds like another "or."
15	for that?	15	MR. ZELLERS: Objection. Form.
16	MR. ZELLERS: Objection. Form.	16	Misstates the evidence and her testimony.
17	THE WITNESS: So again, the results that	17	MR. MEADOWS: Let's mark this.
18	I've seen, it's my understanding they're	18	(Moore Exhibit No. 9 was marked
19	unconclusive whether or not it is asbestos or not.	19	for identification.)
20	That's what the statement reflects.	20	BY MR. MEADOWS:
21	BY MR. MEADOWS:	21	Q So I marked this "true or false" quiz
22	Q Okay. So the basis for that statement	22	Exhibit 9. Do you see I did that?
23	right there in your report is, in part, as a	23	MR. ZELLERS: Is that a
24	result of viewing internal Johnson & Johnson	24	BY MR. MEADOWS:
25	documents that you say show inconclusive positive	25	Q We've been having a discussion about
	Page 203		Page 205
1	results.	1	this all day, right?
2	MR. ZELLERS: Objection. Form,	2	MR. ZELLERS: Is that a question?
3	foundation.	3	MR. MEADOWS: Yeah.
4	THE WITNESS: That's not what I said.	4	BY MR. MEADOWS:
5	BY MR. MEADOWS:	5	Q We've been having a discussion about
6	Q What did you say?	6	Exhibit 9 over the course of today, right?
7	A I said the scientific literature is not	7	MR. ZELLERS: Objection. Form.
8	conclusive.	8	MR. LOCKE: Yeah, I'm going to object to
9	Q So you didn't take into account internal	9	having that whatever it is marked as an
10	documents reflecting positive results, did you?	10	exhibit.
11	MR. ZELLERS: Objection. Form,	11	BY MR. MEADOWS:
12	foundation.	12	Q We've been discussing this over the
13	THE WITNESS: So again, I'm not a	13	course of today, right, your expertise?
14	geologist or a mineralogist. I've seen some	14	MR. ZELLERS: Hold on. Objection.
15	reports that, you know, we could talk about it,	15	Form.
16	each one of them independently if we want. But	16	Are you asking about her expertise or
17	they do not provide evidence that asbestos was	17	are you asking about the notes you put together as
18	definitively found in Johnson's Baby Powder.	18	Exhibit 9.
19	BY MR. MEADOWS:	19	MR. MEADOWS: The notes I put together
20	Q I believe you just said that you're not	20	as Exhibit 9.
21	an expert in geology or mineralogy. Correct?	21	BY MR. MEADOWS:
	A So what I meant by that statement is I'm	22	Q I mean, you've seen me write these notes
22			· · · · · · · · · · · · · · · · · · ·
		23	out, right, today?
22	not an expert in the the exact mechanics of geology or mineralogy, how minerals are formed.	23 24	out, right, today? A I saw you write those notes based on

2 So when you say "on balance," what 2 statement regarding baby powder and Shower to 3 Shower have not been shown to contain asbestos 4 fibers, have you seen testing from Battelle that 5 confirmed the presence of asbestos in baby powder 6 and Shower to Shower? 7 A I don't recall where the documents 8 originated. 9 Q All right. Even though you worked at 10 Battelle, that didn't that's just not something 11 that registered with your memory? 12 A No. 13 Q No? 14 All right. Going back to the your 15 report, on page 17. 16 You have a statement here: "On balance, 17 you have a statement here: "On balance, 29 O What does "on balance it, wouldn't you? 10 Did I read that correctly? 21 A Yes. 22 Q What does "on balance it, wouldn't would a gree that that means that there is some literature that does support a relationship. 18 June		Page 206		Page 208
Shower have not been shown to contain asbestors fibers, have you seen testing from Battelle that confirmed the presence of asbestos in baby powder and Shower to Shower? A I don't recall where the documents originated. Battelle, that didn't — that's just not something that registered with your memory? A No. Q No? All right. Even though you worked at Battering that registered with your memory? A No. Q No? All right. Going back to the — your report, on page 17. You have a statement here: "On balance, scientific literature provides no support for a pot lard and ovarian cancer." Did I read that correctly? A Yes. Q Su that a scientific term? Page 207 A If's a term that I used in this report. A I can't say one way or another. It's an excientific literature that does provide a support for a relationship between perineal tale use and ovarian cancer, wouldn't you? A I can't say one way or another. It's an excientific literature that does provide a support for a relationship between perineal tale use and ovarian cancer, wouldn't you? Page 207 A I Kas I term that I used in this report. A I can't say one way or another. It's an excientific literature that does provide a support for a relationship between perineal tale use and ovarian cancer, wouldn't you? Page 207 A I Kas I term that I used in this report. A I can't say one way or another. It's an excientific literature that does provide a support for a relationship between perineal tale use and ovarian cancer, wouldn't you? MR. ZELLERS: Objection. Form. THE WITNESS: So my opinion is that when you evaluate the entire scientific dataset, that there is scientific literature that does to support for a relationship between perineal tale use and ovarian cancer. A C So I we walked the available information. Is that fair to say? A So I we walked the available information. Is that fair to say? A So I we valuated the available information. Is that fair to say? A So I we valuated the available information.	1	Q Okay. Now, with respect to your	1	Q So when you say "on balance," what
4 fibers, have you seen testing from Battelle that confirmed the presence of asbestos in baby powder and Shower to Shower? A I don't recall where the documents of and Shower to Shower? A I don't recall where the documents of and Shower to Shower? A I don't recall where the documents of a price of the data. 9 Q All right. Even though you worked at Battelle, that didn't that's just not something 10 that registered with your memory? 12 A No. 12 THE WITNESS: Objection. Form. 13 Q No? 13 THE WITNESS: So the the question at hand has to be done it can't be done in an iso isolated fashion by evaluating one study versus another. It's an evaluation of the scientific literature; and the scientific literature of the data. 25 Q Is that a scientific term? 10 Justine that does a support for a povential felicionship between perineal tale use and ovarian cancer. Page 207 1 A It's a term that I used in this report. Q Have you seen that term used in scientific literature and povarian cancer, wouldn't you? 9 Justine the entire scientific dataset, that there is socientific literature that does provide a support for a for a relationship between perineal tale use and ovarian cancer. 10 Justine the entire dataset in order to answer that question of the data. 11 Justine the entire scientific dataset, that there is scientific literature that fove sprovide a support for a for a relationship between perineal tale use and ovarian cancer. 11 Justine the entire dataset, that there is scientific literature that does provide a support to a causal relationship between perineal tale use and ovarian cancer. 12 Justine the entire scientific dataset, that there is socientific literature that does provide a support to a causal relationship between perineal tale use and ovarian cancer. 12 Justine that there is some literature that does provide a support to a causal relationship between perineal tale use and ovarian cancer. 13 Justine that does provide a support to a causal relationship between perineal tale use and ovarian cancer.	2	statement regarding baby powder and Shower to	2	what do you mean by "balance"?
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6 and Shower to Shower? 7 A I don't recall where the documents of a longitude. 9 Q All right. Even though you worked at 10 Battelle, that didn't that's just not something 11 that registered with your memory? 11 that registered with your memory? 12 A No. 12 Misstates her testimony. 13 Q No? 13 THE WITNESS: So the the question at hand has to be done it can't be done in an iso isolated flashion by evaluating one study versus another. It's an evaluation of the scientific literature provides no support for a potential relationship between perineal cosmetic tale and ovarian cancer." 14 A Yes. 20 What does "on balance" mean? 21 A Yes. Q What does "on balance" mean? 22 of the data. 25 Q Is that a scientific term? 25 Well, I think we can go 26 Well, "on would agree that there is some interature that does provide a support for a potential relationship between perineal tale use and ovarian cancer." 24 A Yes. 25 Q Have you seen that term used in scientific literature; 31 Section for a relationship between perineal tale use and ovarian cancer. 32 Of the data. 33 Section for a local control to the data ovarian cancer in the data ovarian cancer in the data ovarian cancer. 34 A I rean't say one way or another. It's an evaluation of the scientific literature that does provide a support for a relationship between perineal tale use and ovarian cancer. 34 A I can't say one way or another. It's an evaluation of the scientific literature that does provide a support for a relationship between perineal tale use and ovarian cancer? 35 Of the data. 36 Of the data ovarian cancer? 36 Of the data. 37 Of the data. 38 Of the data ovarian cancer? 39 Of the data. 39 Of the data ovarian cancer in the data of a relationship between perineal tale use and ovarian cancer? 30 Of the data ovarian cancer? 31 Of the data ovarian cancer? 32 Of the data ovarian cancer? 34 Of the data ovarian cancer? 35 Of the data ovarian cancer? 36 Of the data ovarian cancer? 37 Of the data ovarian cancer? 38 Of the data ovarian cancer? 39 Of the data ovarian	4	fibers, have you seen testing from Battelle that	4	totality of the data.
A I don't recall where the documents originated. Q All right. Even though you worked at the state of the data. A No. All right. Going back to the your the registered with your memory? A No. All right. Going back to the your the registered with your memory? All right. Going back to the your the registered with your memory? All right. Going back to the your the potential relationship between perined cosmetic tale and ovarian cancer. By Mr. MEADOWS: A It means when you evaluate the entirety of the data. A It means when you evaluate the entirety of the data. A It sa term that I used in this report. A It's a term that I used in this report. A It's a term that I used in this report. A It all right is term used in scientific literature? A It's a term that I used in this report. A It all right is term used in scientific literature that does provide a support for a relationship between perineal tale use and ovarian cancer. A It mean if you're having to balance is you agree that that means that there is some alter that there is some alter that you agree that that means that there is some alter that there is some alter. MR. ZELLERS: Objection. Form. THE WITNESS: So the the question at hand has to be done it can't be done in an iso isolated flashion by evaluating one study versus another. It's an evaluation of the scientific dataset. BY MR. MEADOWS: A I mean if you're having to balance it ale use causes ovarian cancer. MR. ZELLERS: Objection. Form. THE WITNESS: So the the question at hand has to be done it can't be done in an iso isolated flashion by evaluating one study versus another. It's an evaluation of the scientific dataset. BY MR. MEADOWS: A I treat that correctly? A It mean if you're having to balance it ale use ause as used as term there is so the one in an iso isolated flashion by evaluating one study versus another. It's an evaluation of the scientific dataset. BY MR. MEADOWS: A I can't say one way or another. It's an evaluation of the scientific data	5	confirmed the presence of asbestos in baby powder	5	Q So it leads me to believe that there is
8 originated. 9 Q All right. Even though you worked at 10 Battelle, that didn't – that's just not something 11 that registered with your memory? 12 A No. 13 Q No? 14 All right. Going back to the – your 15 report, on page 17. 16 You have a statement here: "On balance, 17 Scientific literature provides no support for a 18 potential relationship between perineal cosmetic 19 talc and ovarian cancer." 19 talc and ovarian cancer." 20 Did I read that correctly? 21 A Yes. 22 Q What does "on balance" mean? 23 A It means when you evaluate the entirety 24 of the data. 25 Q Is that a scientific literature? 26 A I can't say one way or another. It's an 27 expression. 28 Q Well, you would agree that there is 29 G Well, you wouldn't you? 20 MR. ZELLERS: Objection. Form. 21 THE WITNESS: So my opinion is that when 25 you sagree that that means that there is some literature that does provide a support and varian cancer. 29 A It means when you caluate the entirety 20 G Have you seen that term used in 21 C Well, you would agree that there is 22 D Well, you would agree that there is 23 Scientific literature that does provide a support for a relationship between perineal tale use and ovarian cancer. 29 MR. ZELLERS: Objection. Form. 20 MR. ZELLERS: Objection. Form. 21 THE WITNESS: Son yo poinion is that when you evaluate the entire scientific dataset, that 24 C Yeah, my question was, you would agree that there is so causal association between perineal tale use and ovarian cancer. 29 MR. ZELLERS: Objection. Form. 210 MR. ZELLERS: Objection. Form. 211 THE WITNESS: Son yo poinion is that when you evaluate the entire scientific dataset, that 12 sea and ovarian cancer. 3 So the — the scientific dataset does not support a causal relationship between perineal tale use and ovarian cancer. 3 So the — the scientific dataset does not support a causal relationship between perineal tale use and ovarian cancer. 3 So the — the scientific dataset does not support a causal relationship between perineal tale use and ovarian cancer. 4 A Ne. 5 O Well, no	6	and Shower to Shower?	6	some literature that does support a relationship.
9 Battelle, that didn't that's just not something 10 10 11 12 13 14 14 15 15 15 15 16 16 17 17 17 18 17 18 18 18	7	A I don't recall where the documents	7	I mean if you're having to balance it, wouldn't
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13	11	- · · · · · · · · · · · · · · · · · · ·	11	-
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evaluate the scientific literature independently 22 Q There's some information that says				
and look at look at each study, and then decide 23 there's no relationship and there's some		-		•
 how the scientific body of evidence weighs in. BY MR. MEADOWS: right? 			4	information that says there is a relationship,
25 BY MR. MEADOWS: 25 right?	った	BY MB MEADOWS:	25	right?

	Page 210		Page 212
1	MR. ZELLERS: Objection. Form.	1	relationship between perineal talc use and ovarian
2	THE WITNESS: So again, maybe it was a	2	cancer.
3	bad phrase to use in my report, but my what my	3	Q All right. In addition to Health
4	report says is that there is no causal	4	Canada, you didn't take into consideration the
5	relationship between perineal talc use and the	5	Saed findings, right?
6	use and the development of ovarian cancer.	6	A So the Saed findings, as we discussed,
7	BY MR. MEADOWS:	7	were methodologically flawed.
8	Q Well, on balance, how much weight or	8	Q So you didn't take into account Saed
9	percentage of studies must there be for you to say	9	because you say his and others all the others
10	that there is a relationship?	10	who who participated in writing that article
11	A So there's not a specific formula. Each	11	and those who peer-reviewed it are just wrong
12	causal relationship has to be evaluated	12	about the methodology.
13	independently, and you have to evaluate the	13	MR. ZELLERS: Objection. Form.
14	dataset that's there. Like I said, if you want to	14	BY MR. MEADOWS:
15	go through the opinions, we can go through them.	15	Q Right?
16	Q Tell me what your methodology was for	16	A That's that's not what I said.
17	reaching that conclusion.	17	Q No?
18	A For the conclusion that	18	A No.
19	Q The one that's highlighted right here	19	Q So their methodology is okay, you agree
20	that we've been talking about: "On balance,	20	with it now?
21	scientific literature provides no support for a	21	A I said it was flawed, not wrong.
22	potential relationship between perineal talc use	22	Q Okay. And that Health Canada, you can't
23	and ovarian cancer."	23	take that into consideration when you wrote this
24	A So the methodology is is my report,	24	statement
25	and so in the introduction sections of my report,	25	MR. MEADOWS: Objection. Misstates the
	Page 211		Page 213
1	I lay out what toxicology is, what a risk	1	evidence.
2	assessment is, hazard versus dose, and then in the	2	BY MR. MEADOWS:
3	subsequent sections, I evaluate the the	3	Q because you just didn't. You didn't
4	literature based on those criteria. It's a	4	include it anywhere in your report, right?
5	general toxicology assessment.	5	MR. ZELLERS: Objection. Compound.
6	Q When you wrote that statement, you	6	BY MR. MEADOWS:
7	didn't take into account Health Canada that we		
		7	Q Is Health Canada in your report?
8	discussed earlier. Right?	7 8	Q Is Health Canada in your report?A Health Canada is not included in my
8 9			A Health Canada is not included in my report.
	discussed earlier. Right? MR. ZELLERS: Objection. Misstates her testimony.	8 9 10	A Health Canada is not included in my report. Q Thank you.
9	discussed earlier. Right? MR. ZELLERS: Objection. Misstates her testimony. THE WITNESS: Well, I think we did	8 9	A Health Canada is not included in my report. Q Thank you. A Health Canada did a different type of
9 10	discussed earlier. Right? MR. ZELLERS: Objection. Misstates her testimony. THE WITNESS: Well, I think we did discuss while we did discuss Health Canada	8 9 10	A Health Canada is not included in my report. Q Thank you. A Health Canada did a different type of assessment than I did.
9 10 11	discussed earlier. Right? MR. ZELLERS: Objection. Misstates her testimony. THE WITNESS: Well, I think we did	8 9 10 11	A Health Canada is not included in my report. Q Thank you. A Health Canada did a different type of assessment than I did. Q Is it your opinion that talc cannot
9 10 11 12 13 14	discussed earlier. Right? MR. ZELLERS: Objection. Misstates her testimony. THE WITNESS: Well, I think we did discuss while we did discuss Health Canada earlier, they did a different methodology than I did.	8 9 10 11 12	A Health Canada is not included in my report. Q Thank you. A Health Canada did a different type of assessment than I did. Q Is it your opinion that tale cannot migrate from the perineum to the ovaries?
9 10 11 12 13	discussed earlier. Right? MR. ZELLERS: Objection. Misstates her testimony. THE WITNESS: Well, I think we did discuss while we did discuss Health Canada earlier, they did a different methodology than I	8 9 10 11 12 13	A Health Canada is not included in my report. Q Thank you. A Health Canada did a different type of assessment than I did. Q Is it your opinion that tale cannot
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1		Page 214		Page 216
Q I show you what I marked as Exhibit 10. A Tannk you. Q Flip over to page 5 - well, first of all, are you familiar with this document. A Yes, I have seen this document. Q Page 5. You'll see I have highlighted on the page, I already highlighted the area I want to talk about. I'll read the whole paragraph. The whole perineum and to talk about. I'll read the whole paragraph. The warm of warming the perineum and vargins to the perineum and the vagins to the perineum and the perineum and the vagins to the perineum and the perineum and the vagins to the perineum and the vagi	1	for identification.)	1	want her now to look at the whole letter
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Solution	3	Q I show you what I marked as Exhibit 10.	3	MR. MEADOWS: No, I don't.
all, are you familiar with this document? A Yes, I have seen this document. Q Page 5. You'll see I have highlighted on the page, I already highlighted the area I want to talk about. I'll read the whole paragraph. "While there exists no direct proof of tale and ovarian carcinogenesis, the potential for a particulates to migrate from the perineum and vagina to the peritoneal cavity is indisputable." MR. ZELLERS: Where – I'm sorry, Coursel. Are you reading the highlighted paragraph or	4	A Thank you.	4	MR. ZELLERS: what you read or that
A Yes, I have seen this document. Q Page 5. You'll see I have highlighted 9 on the page, I already highlighted the areal want 10 to talk about. I'll read the whole paragraph. 11 "While there exists no direct proof of 12 tale and ovarian carcinogenesis, the potential for 13 paragraph or - ool, okay, up above. Excuse me. 14 vagins to the perineal cavity is infopstuable." 15 MR. ZELLERS: Where - I'm sorry, 16 Counsel. Are you reading the highlighted paparagraph or - ool, okay, up above. Excuse me. 18 Thank you. 19 BY MR. MEADOWS: 20 Q "It is therefore plausible the perineal tale and other particulate that reaches the endometrial cavity, is Idlopian tubes, ovaries, 21 peritoneum - and peritoneum may elicit a foreign body type reaction and inflammatory response that in some exposed women may progress to epithelial to some exposed women may progress to epithelial body type reaction and inflammatory response that in some exposed women may progress to epithelial body type reaction and inflammatory response that in some exposed women may progress to epithelial body type reaction and inflammatory response that in some exposed women may progress to epithelial body type reaction and inflammatory response that in some exposed women may progress to epithelial body type reaction and inflammatory response that in some exposed women may progress to epithelial body type reaction and inflammatory response that in some exposed women may progress to epithelial body type reaction and inflammatory response that in some exposed women may progress to epithelial body type reaction and inflammatory response that in some exposed women may progress to epithelial body type reaction and inflammatory response that in some exposed women may progress to epithelial body type reaction and inflammatory response that in some exposed women may progress to epithelial body type reaction and inflammatory response that in some exposed women may progress to epithelial body type reaction and inflammatory response that in some exposed women may progress t	5	Q Flip over to page 5 well, first of	5	paragraph?
9 O Page 5. You'll seet Lave highlighted on the page, I already highlighted the area I want to the page, I already highlighted the area I want to the page, I already highlighted the area I want to the page, I already highlighted the area I want to the page, I already highlighted the area I want to the page, I already highlighted rale and ovarian carcinogenesis, the potential for 12 tale and ovarian carcinogenesis, the potential for 13 particulates to migrate from the perineum and vagina to the perinoal cavity is indisputable." MR. ZELLERS: Where – The morry, 15 MS. O'DELL: I'm objecting to his objection. BY MR. MEADOWS: O O YIt is therefore plausible the perineal tale and other particulate that reaches the endometrial cavity, fallopian tubes, ovaries, 22 perinonum – and perinonum may progress to epithelial body type reaction and inflammatory response that 15 ms ome exposed women may progress to epithelial 25 ms. Page 215 Cancers. However, there has been no conclusive evidence to support causality: Page 215 Page 215 Cancers. However, there has been no conclusive evidence to support causality: Page 215 A You read that statement correctly, 4 A You read that statement correctly, 5 Q Wilt respect to this sentence here – well, let me ask you this: What part of that do you disagree with – do you disagree with anything in red there? MR. ZELLERS: Objection. Form. BY MR. MEADOWS: MR. MEADOWS: MR. ZELLERS: Objection. Form. BY MR. MEADOWS: MR. ZELLERS: Seame objection. Form. BY MR. MEADOWS: MR. ZELLERS: Seame objection. Porm. BY MR. MEADOWS: A Go Wilt respect to this sentence here – well, let me ask you this: What part of that do you disagree with – do you disagree with anything in red the entire paragraph. MR. ZELLERS: Tread the whole paragraph. MR. MEADOWS:	6	all, are you familiar with this document?	6	MR. MEADOWS: I don't. I want her to
on the page, I already highlighted the area I want to talk about. I'll read the whole paragraph. while there exists no direct proof of talc and ovarian carcinogenesis, the potential for talc and ovariancarcinogenesis, th	7	A Yes, I have seen this document.	7	answer my question.
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15	13	particulates to migrate from the perineum and	13	MS. O'DELL: I'm objecting to his
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55 (Pages 214 to 217)

	Page 218		Page 220
1	A I'm saying that "potential" is is not	1	A Yes. Sorry.
2	forceful. "Plausible," again, I don't know what	2	Q Flip over to page I guess it's 122-S.
3	they mean by the word "plausible" in that	3	I'm not real sure how to read that.
4	sentence. And then "may elicit," again not	4	A 122
5	definitive, not conform confirmatory. There	5	Q It's toward the back.
6	are no studies that are cited. And "may	6	A Okay. I get it. They all have S's.
7	progress." I mean, again, not a supportive	7	Okay.
8	statement, not a definitive statement, and	8	Q Let me try to draw just put this up
9	absolutely no literature citations to support	9	here.
10	any of anything that's written in that	10	All right. I've highlighted a section
11	statement.	11	on here.
12	Q So you disagree with Health Canada.	12	"As evidenced in this safety assessment,
13	Right?	13	numerous studies have been performed to
14	A So again, it's not about agreeing or	14	investigate whether or not a causative
15	disagreeing. I think they came to I came to my	15	relationship exists between the cosmetic use of
16	conclusion, and I don't really understand what	16	talc in the perineal area and ovarian cancer. A
17	they did. It was a different process to mine.	17	panel reviewed these studies thoroughly and
18	Q You disagree with Health Canada. You	18	determined they do not support a causal link. The
19	disagree with the FDA. You disagree with Saed and	19	panel stated that causation would depend on the
20	all the other scientists who wrote the Saed	20	migration of talc from the perineum to the
21	article and who peer-reviewed the Saed article.	21	ovaries. There is no conclusive explanation for
22	Right?	22	the presence of talc in the ovaries reported in
23	MR. LOCKE: Objection.	23	some studies. However, the panel agreed that
24	MR. ZELLERS: Objection. Misstates her	24	there is no known physiological mechanism by which
25	testimony, argumentative.	25	tale can plausibly migrate from the perineum to
	teetinony, argumentarive.		tate can plausioly inigrate from the permeant to
	Page 219		Page 221
1	BY MR. MEADOWS:	1	the ovaries."
2	Q Do you disagree with any of them?	2	Do you agree with that?
3	A Okay. So again, it's about the science,	3	MR. ZELLERS: Objection. Form.
4	what and what was done.	4	THE WITNESS: So do I agree with the
5	Q Let's see if we can find something you	5	statement as you've read it or the statement in
6	do agree with.	3	statement as you've read it of the statement in
	do agree with.	6	general?
7	(Moore Exhibit No. 11 was marked		
7 8	-	6	general?
	(Moore Exhibit No. 11 was marked	6 7	general? BY MR. MEADOWS: Q The statement as I just read, do you agree with that?
8	(Moore Exhibit No. 11 was marked for identification.)	6 7 8	general? BY MR. MEADOWS: Q The statement as I just read, do you
8 9	(Moore Exhibit No. 11 was marked for identification.) BY MR. MEADOWS: Q I show you what I marked as Exhibit 11. A Thank you.	6 7 8 9	general? BY MR. MEADOWS: Q The statement as I just read, do you agree with that?
8 9 10	(Moore Exhibit No. 11 was marked for identification.) BY MR. MEADOWS: Q I show you what I marked as Exhibit 11.	6 7 8 9 10	general? BY MR. MEADOWS: Q The statement as I just read, do you agree with that? A So I guess I don't know what the panel actually reviewed, but that this is consistent with my opinion.
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56 (Pages 218 to 221)

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MR. MEADOWS:	22	Q And does it follow that if talc can cause granulomas, that if it's if talc is
		cause granulomas, that if it's if talc is
Q Bo you agree with the statement ive	23	
derlined: "Talc should not be used on skin		exposed to ovarian tissue, that it can also cause
ere the epidermal barrier is removed or on skin	24	a foreign body reaction?
t has greater than first degree burns"?	25	A So again, this is a pretty a pretty
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MR. ZELLERS: Object. Asked and	1	general statement and very hypothetical. So if
swered.	2	you want to talk about the studies, we can talk
THE WITNESS: Again, I'd have to see the	3	about the studies.
e reports	4	Q No, I want you to answer my question.
MR. MEADOWS:	5	MR. ZELLERS: Objection. Form.
Q I'm not asking about the case reports.	6	BY MR. MEADOWS:
asking about this one statement. If I have to	7	Q If it's a hypothetical or not, I want
l this away and write it out, I'll do that.	8	A Well, you're making an assumption that
But I'm just asking about this one	9	the talc actually makes it to the ovaries.
tement. I'm not asking about the case report.	10	Q There we go. That's what it all comes
e underlined exactly what I'm asking you about.	11	down to with you, right?
a concept: Talc should not be used on skin	12	MR. ZELLERS: Objection. Argumentative.
ere the epidermal barrier is removed or on skin	13	BY MR. MEADOWS:
t has greater than first degree burns.	14	Q It's all about whether the talc can make
Do you agree with that as a toxicologist	15	it to the ovaries, right?
	16	A No.
do you disagree with it?	17	Q So if talc is deposited on the ovary,
do you disagree with it? MR. ZELLERS: Objection. Form, asked	18	does it have the potential to be toxic?
	19	MR. ZELLERS: Objection. Form.
MR. ZELLERS: Objection. Form, asked	20	THE WITNESS: Again, you'd have to look
MR. ZELLERS: Objection. Form, asked answered. THE WITNESS: Again, I would have to go	21	at the dose.
MR. ZELLERS: Objection. Form, asked answered.	1	
MR. ZELLERS: Objection. Form, asked answered. THE WITNESS: Again, I would have to go ck and look at the case reports that they're	22	BY MR. MEADOWS:
MR. ZELLERS: Objection. Form, asked answered. THE WITNESS: Again, I would have to go ck and look at the case reports that they're t they're discussing here to understand what he of dose was associated with these case		BY MR. MEADOWS: Q Okay. At what level does talc become
MR. ZELLERS: Objection. Form, asked answered. THE WITNESS: Again, I would have to go ck and look at the case reports that they're t they're discussing here to understand what	22	
t	has greater than first degree burns. Do you agree with that as a toxicologist o you disagree with it? MR. ZELLERS: Objection. Form, asked answered. THE WITNESS: Again, I would have to go k and look at the case reports that they're	has greater than first degree burns. Do you agree with that as a toxicologist o you disagree with it? MR. ZELLERS: Objection. Form, asked answered. THE WITNESS: Again, I would have to go k and look at the case reports that they're they're discussing here to understand what

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1	foundation.	1	Q Including tale on an ovary.
2	THE WITNESS: Okay. That is a complete	2	MR. ZELLERS: Objection. Form.
3	hypothetical.	3	THE WITNESS: So every substance known
4	BY MR. MEADOWS:	4	to man is toxic given a high enough dose.
5	Q Okay. I'm asking you.	5	BY MR. MEADOWS:
6	MR. ZELLERS: Same objections.	6	Q But your position is that the ovary can
7	THE WITNESS: At the concentration so	7	never be exposed to a high enough level of talc in
8	again, I'm unable to accept that assumption to	8	order to be toxic, right?
9	answer that question.	9	MR. ZELLERS: Objection to form.
10	BY MR. MEADOWS:	10	THE WITNESS: That's not my opinion.
11	Q You cannot answer the question as to	11	BY MR. MEADOWS:
12	whether talc can be toxic to an ovary.	12	Q It's not your opinion?
13	MR. ZELLERS: Objection. Asked and	13	A So your your question is very
14	answered.	14	general. So I don't believe that perineal
15	THE WITNESS: So I said it can be toxic	15	exposure is associated with ovarian exposure.
16	if it reaches a dose that's associated with	16	Q Right. That that your position is
17	toxicity.	17	that talc can never get there, right?
18	BY MR. MEADOWS:	18	MR. ZELLERS: Objection.
19	Q Okay. So you would agree that talc can	19	BY MR. MEADOWS:
20	be toxic to the ovary.	20	Q It can never get to the ovary.
21	MR. ZELLERS: Objection.	21	MR. ZELLERS: Objection. Form.
22	THE WITNESS: So what are you defining	22	Misstates her testimony.
23	as "toxic"?	23	THE WITNESS: So the scientific data do
24	BY MR. MEADOWS:	24	not show that talc applied perineal perineally
25	Q Well, that's a term you use as a	25	can migrate to the ovaries.
	Page 227		Page 229
1	toxicologist.	1	BY MR. MEADOWS:
2	A Right.	2	Q And so that in that opinion, you
3	Q So whatever you think "toxic" means.	3	disagree with the FDA. We've already established
4	MR. ZELLERS: Okay. Objection. Vague.	4	that, right?
5	THE WITNESS: Okay. So so what was	5	MR. ZELLERS: Objection. Asked and
6	the what did you ask me?	6	answered.
7	BY MR. MEADOWS:	7	THE WITNESS: So again, we can go back
8	Q You would agree with me that talc can be	8	to the EPA document, and I can discuss
9	toxic to the ovary.	9	BY MR. MEADOWS:
10	MR. ZELLERS: Objection. Form.	10	Q Well, I was on the FDA document.
11	THE WITNESS: Well, again	11	A Or, sorry, my fault. Yeah, yeah.
12	BY MR. MEADOWS:	12	Sorry. Go back to the FDA document and discuss
13	Q Well, let me rephrase it again.	13	that.
14	Whatever you "toxic" is a term that you use as	14	Q Well, let me ask you this.
15	a toxicologist, right?	15	(Counsel conferring.)
16	A Correct. Yeah, it's	16	BY MR. MEADOWS:
± 0	Q And that's part of the lingo.	17	Q So when you say that, are you
17	Z And mais part of the migo.	18	discounting the literature that is there that is
17 18	Δ Ves		-
18	A Yes. O Okay So whatever your definition of		evidence of tale migrating to the overies?
18 19	Q Okay. So whatever your definition of	19	evidence of talc migrating to the ovaries?
18 19 20	Q Okay. So whatever your definition of "toxic" is as a toxicologist, the question is, can	19 20	And in particular, I'm referring to the
18 19 20 21	Q Okay. So whatever your definition of "toxic" is as a toxicologist, the question is, can talc be toxic to the ovary?	19 20 21	And in particular, I'm referring to the ones I have on the screen here.
18 19 20 21 22	Q Okay. So whatever your definition of "toxic" is as a toxicologist, the question is, can talc be toxic to the ovary? MR. ZELLERS: Objection. Form.	19 20 21 22	And in particular, I'm referring to the ones I have on the screen here. "Cramer, 2007. Presence of talc in
18 19 20 21 22 23	Q Okay. So whatever your definition of "toxic" is as a toxicologist, the question is, can talc be toxic to the ovary? MR. ZELLERS: Objection. Form. THE WITNESS: So everything is toxic	19 20 21 22 23	And in particular, I'm referring to the ones I have on the screen here. "Cramer, 2007. Presence of talc in lymph nodes provides evidence that talc used
18 19 20 21 22	Q Okay. So whatever your definition of "toxic" is as a toxicologist, the question is, can talc be toxic to the ovary? MR. ZELLERS: Objection. Form.	19 20 21 22	And in particular, I'm referring to the ones I have on the screen here. "Cramer, 2007. Presence of talc in

1	Page 230		Page 232
т т	"Langseth, 2008. Talc particles can	1	doesn't have a period at the end. You know,
2	migrate from the vagina to the peritoneal cavity	2	let's let's take out those articles, and we can
3	and ovaries."	3	review those articles one by one.
4	"Cramer, 2016. Biologic credibility of	4	Q Well, all right. So those articles are
5	the talc epithelial/ovarian cancer association is	5	not ones that are you're very familiar with
6	enhanced by persuasive evidence that inert	6	that you can you and I can talk about without
7	particles the size of talc present in the vagina	7	having the article right in front of us?
8	can migrate to the upper genital tract."	8	MR. ZELLERS: Objection. Form.
9	"Schildkraut, 2016. Increased risk of	9	THE WITNESS: So I've read a lot of
10	African-American women consistent with localized	10	articles, and just in order to be accurate here
11	chronic inflation inflammation in the ovary due	11	today, I would like to look at the article.
12	to particulates that travel through a direct	12	You're pulling one sentence
13	transvaginal route."	13	BY MR. MEADOWS:
14	And then McDonald, which	14	Q Let's take a look at McDonald. That's
15	MR. MEADOWS: Have we already talked	15	the latest pronouncement on this.
16	about McDonald?	16	(Moore Exhibit No. 12 was marked
17	MS. TUCKER: No.	17	for identification.)
18	BY MR. MEADOWS:	18	BY MR. MEADOWS:
19	Q Okay. We'll talk about McDonald in just	19	Q I handed you what I think is marked as
20	a minute.	20	Exhibit 12.
21	So you disagree with those articles that	21	A Yep.
22	I just highlighted and put on the screen, right?	22	Q So this is an article entitled
23	MR. ZELLERS: Objection. Form,	23	"Correlative Polarizing Light and the Scanning
24	compound.	24	Electron Microscope for the Assessment of Talc in
25	THE WITNESS: So those statements, I'm	25	Pelvic Region Lymph Nodes."
23	THE WITTLESS. So those statements, Thi		Tervie Region Lymph Nodes.
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-1	not sure if they're accurate from those		
1		1	The first name is McDonald. It's Sandra
2	publications or not without looking at the	1 2	The first name is McDonald. It's Sandra McDonald?
2	publications or not without looking at the	2	McDonald?
2	publications or not without looking at the publications. They're one sentence that's been	2 3	McDonald? I'm I'm going to assume it's Yuwei
2 3 4	publications or not without looking at the publications. They're one sentence that's been extracted potentially out of context, so I don't	2 3 4	McDonald? I'm I'm going to assume it's Yuwei Fan, William Welch, Daniel Cramer, Rebecca
2 3 4 5	publications or not without looking at the publications. They're one sentence that's been extracted potentially out of context, so I don't know what context those sentences are from. It	2 3 4 5	McDonald? I'm I'm going to assume it's Yuwei Fan, William Welch, Daniel Cramer, Rebecca Stearns, Liam Sheedy, Marshall Katler, and John
2 3 4 5 6	publications or not without looking at the publications. They're one sentence that's been extracted potentially out of context, so I don't know what context those sentences are from. It could be potentially misleading. I I just I	2 3 4 5 6	McDonald? I'm I'm going to assume it's Yuwei Fan, William Welch, Daniel Cramer, Rebecca Stearns, Liam Sheedy, Marshall Katler, and John Godleski.
2 3 4 5 6 7	publications or not without looking at the publications. They're one sentence that's been extracted potentially out of context, so I don't know what context those sentences are from. It could be potentially misleading. I I just I can't comment on the on those on those	2 3 4 5 6 7	McDonald? I'm I'm going to assume it's Yuwei Fan, William Welch, Daniel Cramer, Rebecca Stearns, Liam Sheedy, Marshall Katler, and John Godleski. Did I read that correctly?
2 3 4 5 6 7 8	publications or not without looking at the publications. They're one sentence that's been extracted potentially out of context, so I don't know what context those sentences are from. It could be potentially misleading. I I just I can't comment on the on those on those supposed quotations, unless we're going to look at those articles individually. BY MR. MEADOWS:	2 3 4 5 6 7 8	McDonald? I'm I'm going to assume it's Yuwei Fan, William Welch, Daniel Cramer, Rebecca Stearns, Liam Sheedy, Marshall Katler, and John Godleski. Did I read that correctly? A I believe so.
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	Page 234		Page 236
1	Foundation.	1	foundation.
2	THE WITNESS: No, I do not.	2	THE WITNESS: So
3	BY MR. MEADOWS:	3	BY MR. MEADOWS:
4	Q Have you ever read this article?	4	Q Do you disagree with those statements?
5	A No, I don't believe I have.	5	MR. ZELLERS: Same objection. You've
6	Q Flip over to page 12.	6	given her an article. You've isolated out a
7	You'll see on the screen I've	7	couple of sentences, and then asked her if she
8	gone about, I don't know, maybe a quarter of the	8	agrees or disagrees.
9	way down. The paragraph starts with "Talc."	9	BY MR. MEADOWS:
10	"Talc, when applied to the perineum, is	10	Q Do you disagree with those statements?
11	believed to migrate to the upper genital tract,	11	A So my opinion is that that the
12	passing through the open tract to the fallopian	12	evi the scientific evidence did not support
13	tubes, and eventually reaching the ovaries."	13	that talc migrates from the perineum to the
14	Go on down to the next paragraph. "This	14	ovary to the ovarian tissue.
15	study supports earlier observations that talc	15	If you could put those quotations back
16	particles from perineal exposure can and do	16	on the screen for a second. Can I see them again,
17	migrate to the pelvic lymph nodes."	17	please? The ones you highlighted.
18	Did I read that correctly?	18	Q Sure. You got the whole article right
19	MR. ZELLERS: Objection. Form.	19	there.
20	THE WITNESS: So you read that sentence	20	A Well, I didn't
21	correctly, but again, I haven't seen this article	21	Q Do you need a highlighter to highlight
22	to understand its context.	22	as I go? You can
23	BY MR. MEADOWS:	23	A Can I
24	Q Go to the next page.	24	Q Sure.
25	A Hold on a second.	25	MR. ZELLERS: I don't want you to
			·
	Daga 225		
	Page 235		Page 237
1	Q I highlighted another sentence.	1	highlight the court copy.
1 2		1 2	highlight the court copy. THE WITNESS: Okay. Well, I just I
	Q I highlighted another sentence.A Okay.Q "This adds perspective to the known		highlight the court copy. THE WITNESS: Okay. Well, I just I just wanted to look at the I don't need to
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	Page 238		Page 240
1	sentence. It's out of context. There are no	1	sentences that were pulled out of their
2	references for me to evaluate that that	2	publication. Again, I haven't had time to
3	reference.	3	review evaluate the context.
4	BY MR. MEADOWS:	4	BY MR. MEADOWS:
5	Q Next page. "This adds perspective to	5	Q At one point in your report you cite to
6	the known migratory capabilities and overall	6	the NCI website in support of your opinions,
7	biological role/impact of talc."	7	right?
8	Do you disagree with that statement?	8	A Let's look at the where in the report
9	MR. ZELLERS: Objection. Form,	9	that I had written that, please. Find that.
10	foundation.	10	Q Page 18.
11	THE WITNESS: Well, again, this is one	11	A Thank you.
12	sentence without references and without overall	12	Yes, I see that in my I have NCI in
13	context. I can't review why they put that in	13	my report.
14	there, but I do not well, the scientific	14	Q And you consider the NCI website to be
15	literature does not agree with that statement.	15	medical or scientific literature?
16	BY MR. MEADOWS:	16	A I consider it to be a a source of
17	Q Last one. "Exposure such as perineal	17	information regarding cancer.
18	application, whether known clinically or not,	18	Q You cited to it in your report, right?
19	often results in significant deposition of talc in	19	A I did.
20	the tissues."	20	Q Did did you look at their cites,
21	Do you disagree with that statement?	21	their references?
22	MR. ZELLERS: Objection. Form.	22	A I I probably did. I mean, I know I
23	THE WITNESS: So again, it's a one	23	did. I just can't recall them at this moment.
24	sentence that's taken out of context with	24	Q Did you look at what they've stated over
25	absolutely no references, and it it does	25	the years regarding talc use and ovarian cancer?
	Page 239		Page 241
1	contradict what I observed when I evaluated the	1	A I have not I can't remember if I did
2	scientific dataset, which does not support that	2	that or not.
3	perineal exposure to talc that the talc can	3	(Moore Exhibit No. 13 was marked
4	migrate to the ovaries.	4	for identification.)
5	BY MR. MEADOWS:		
6		5	BY MR. MEADOWS:
O	Q So you disagree with McDonald, Fan,	5 6	BY MR. MEADOWS: Q I show you what's been marked as
7	Q So you disagree with McDonald, Fan, Welch, Cramer, Stearns, Sheedy, Katler, Godleski,	1	Q I show you what's been marked as Exhibit 13.
	The state of the s	6	Q I show you what's been marked asExhibit 13.A Thank you.
7	Welch, Cramer, Stearns, Sheedy, Katler, Godleski,	6 7	Q I show you what's been marked as Exhibit 13.
7 8	Welch, Cramer, Stearns, Sheedy, Katler, Godleski, all the authors of the Cramer 2000 study, all the authors of the Langseth 2008 study, all the authors of the Cramer 2016 study, all the authors	6 7 8	Q I show you what's been marked asExhibit 13.A Thank you.
7 8 9	Welch, Cramer, Stearns, Sheedy, Katler, Godleski, all the authors of the Cramer 2000 study, all the authors of the Langseth 2008 study, all the authors of the Cramer 2016 study, all the authors of the Schildkraut 2016 study, and all of those	6 7 8 9	Q I show you what's been marked asExhibit 13.A Thank you.Q Flip over to actually, this is a page
7 8 9 10	Welch, Cramer, Stearns, Sheedy, Katler, Godleski, all the authors of the Cramer 2000 study, all the authors of the Langseth 2008 study, all the authors of the Cramer 2016 study, all the authors	6 7 8 9 10	 Q I show you what's been marked as Exhibit 13. A Thank you. Q Flip over to actually, this is a page from the NCI website. This is what you were
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7 8 9 10 11 12 13	Welch, Cramer, Stearns, Sheedy, Katler, Godleski, all the authors of the Cramer 2000 study, all the authors of the Langseth 2008 study, all the authors of the Cramer 2016 study, all the authors of the Schildkraut 2016 study, and all of those who peer-reviewed these articles, and the FDA on whether talc can migrate to the ovaries, right? MR. LOCKE: Objection. MR. ZELLERS: Objection. Form, argumentative, compound.	6 7 8 9 10 11 12 13 14	Q I show you what's been marked as Exhibit 13. A Thank you. Q Flip over to actually, this is a page from the NCI website. This is what you were citing to, right? A I was citing to the NCI. Q Yeah. A I don't know that it's the same website
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7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Welch, Cramer, Stearns, Sheedy, Katler, Godleski, all the authors of the Cramer 2000 study, all the authors of the Langseth 2008 study, all the authors of the Cramer 2016 study, all the authors of the Schildkraut 2016 study, and all of those who peer-reviewed these articles, and the FDA on whether talc can migrate to the ovaries, right? MR. LOCKE: Objection. MR. ZELLERS: Objection. Form, argumentative, compound. THE WITNESS: So all of the statements that you put up, the ones you put up previously, Langseth and I can't remember all the others that were up on the board those were individual sentences that were pulled potentially out of	6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q I show you what's been marked as Exhibit 13. A Thank you. Q Flip over to actually, this is a page from the NCI website. This is what you were citing to, right? A I was citing to the NCI. Q Yeah. A I don't know that it's the same website or not. Q And the date on this is from 2014, so it would have been a few years ago, right? A It appears to be the case, yes. Q Okay. So if you flip over, and it says, "Talc." The NCI in 2014 said: "The use of talc may increase the risk of ovarian cancer. Talcum
7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Welch, Cramer, Stearns, Sheedy, Katler, Godleski, all the authors of the Cramer 2000 study, all the authors of the Langseth 2008 study, all the authors of the Cramer 2016 study, all the authors of the Schildkraut 2016 study, and all of those who peer-reviewed these articles, and the FDA on whether talc can migrate to the ovaries, right? MR. LOCKE: Objection. MR. ZELLERS: Objection. Form, argumentative, compound. THE WITNESS: So all of the statements that you put up, the ones you put up previously, Langseth and I can't remember all the others that were up on the board those were individual sentences that were pulled potentially out of context. I'm unable to evaluate the context of	6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q I show you what's been marked as Exhibit 13. A Thank you. Q Flip over to actually, this is a page from the NCI website. This is what you were citing to, right? A I was citing to the NCI. Q Yeah. A I don't know that it's the same website or not. Q And the date on this is from 2014, so it would have been a few years ago, right? A It appears to be the case, yes. Q Okay. So if you flip over, and it says, "Talc." The NCI in 2014 said: "The use of talc may increase the risk of ovarian cancer. Talcum powder dusted on the perineum (the area between

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	Page 242		Page 244
1	A You read that correctly.	1	about us having talked about the CIR earlier is
2	Q You read my mind.	2	because you cite to it on page 18 of your report,
3	You disagree with that?	3	second bullet point under the NCI.
4	MR. ZELLERS: Objection. Form.	4	Do you see that?
5	THE WITNESS: So the scientific dataset	5	A I do see that.
6	does not support that talcum powder dusted on the	6	Q Got it on the screen there. Is it
7	perineum reaches the ovaries.	7	ringing a bell now, the CIR, Cosmetic Ingredient
8	BY MR. MEADOWS:	8	Review?
9	Q So you'd say the NCI got it wrong that	9	A I do see that
10	time, right?	10	Q C-I-R.
11	MR. ZELLERS: Objection to form.	11	A yes.
12	THE WITNESS: So I don't know what the	12	Q Okay.
13	NCI did in their evaluation when they put that	13	A Yeah, sorry. I was referring to it in
14	statement	14	my head as Fiume.
15	BY MR. MEADOWS:	15	Q So you cited to the CIR as support for
16	Q Because you haven't looked at that, have	16	your opinions, right?
17 18	you?	17 18	A These were just examples of other
18 19	MR. ZELLERS: Objection. Form. THE WITNESS: So this is the first time	19	opinions, yes. Q Mm-hmm.
20	that I've seen this document, so I'd have to	20	•
21	research into this and look to see if how they	21	A They did not inform my opinions. The scientific dataset informed my opinions.
22	evaluated that and whether or not there was any	22	Q Okay. So we don't how am I supposed
23	scientific basis behind that statement.	23	to consider that in this whole section then?
24	BY MR. MEADOWS:	24	Is it not does not inform your opinions or form
25	Q Now, we talked earlier about the CIR,	25	the basis of your opinions?
	Q 110W, We taked carrier about the Oric,		are cases of your opinions.
	Page 243		Page 245
	2		rage 243
1	right?	1	A They do help to form the basis of
1 2	right? A Pardon? I don't the CIR?	1 2	
	right?		A They do help to form the basis of opinions, yes. Q Okay. Well, the CIR, do you consider
2 3 4	right? A Pardon? I don't the CIR? Q Yeah. You don't remember talking about that?	2 3 4	A They do help to form the basis of opinions, yes. Q Okay. Well, the CIR, do you consider them to be a reliable source?
2 3 4 5	right? A Pardon? I don't the CIR? Q Yeah. You don't remember talking about that? MR. ZELLERS: Objection. Form, vague.	2 3 4 5	A They do help to form the basis of opinions, yes. Q Okay. Well, the CIR, do you consider them to be a reliable source? A I consider all references, all
2 3 4 5 6	right? A Pardon? I don't the CIR? Q Yeah. You don't remember talking about that? MR. ZELLERS: Objection. Form, vague. THE WITNESS: So refresh me. I we've	2 3 4 5 6	A They do help to form the basis of opinions, yes. Q Okay. Well, the CIR, do you consider them to be a reliable source? A I consider all references, all scientific studies independently, and evaluate
2 3 4 5 6 7	right? A Pardon? I don't the CIR? Q Yeah. You don't remember talking about that? MR. ZELLERS: Objection. Form, vague. THE WITNESS: So refresh me. I we've talked about a lot of things today.	2 3 4 5 6 7	A They do help to form the basis of opinions, yes. Q Okay. Well, the CIR, do you consider them to be a reliable source? A I consider all references, all scientific studies independently, and evaluate them.
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1 2	Page 246		Page 248
	Q Mm-hmm. Well, part of her methodology	1	BY MR. MEADOWS:
	was that she didn't find the CIR to be reliable.	2	Q Okay. Well, you've seen the report, and
3	Does that ring a bell with you?	3	apparently it didn't her findings and and
4	MR. LOCKE: Objection.	4	the evidence that she cited to and was available
5	MR. ZELLERS: Objection. Form.	5	to you did not have any influence on you with
6	THE WITNESS: Again, I'd have to see the	6	respect to CIR because you cite to them, right?
7	document in order to understand this discussion.	7	MR. ZELLERS: Objection. Form.
8	BY MR. MEADOWS:	8	THE WITNESS: Again, I would want to see
9	Q Well, if you will remember, Dr. Plunkett	9	her report in order to have this discussion.
10	says that she's seen sworn testimony that supports	10	MR. MEADOWS: I tell you what, let's
11	the idea and confirms the idea that the CIR is an	11	take a short break, and let me see if I can meet
12	industry-funded group, cosmetic industry-funded	12	with my colleagues and
13	group. Were you aware of that?	13	MR. ZELLERS: Sure. Sounds good.
14	MR. ZELLERS: Objection. Form,	14	MR. MEADOWS: Whittle some things.
15	foundation.	15	THE VIDEOGRAPHER: The time is 3:23
16	THE WITNESS: So again, I'd have to see	16	p.m., and we're going off the record.
17	the document in order to comment on this.	17	(Recess.)
18	BY MR. MEADOWS:	18	THE VIDEOGRAPHER: The time is 3:43
19	Q And that there are internal documents	19	p.m., and we are back on the record.
20	that show that outside influences orchestrated the	20	BY MR. MEADOWS:
21	drafting of the CIR report that we were looking at	21	Q Dr. Moore, going back to your report,
22	earlier that you cite to here, did you see that in	22	the first page of your report, under "Asbestos."
23	her report?	23	Number 2, you state: "Scientific studies do not
24	MR. LOCKE: Objection.	24	support the theory that asbestos, as an alleged
25	MR. ZELLERS: Objection. Form.	25	contaminant in tale, causes ovarian cancer in
			contaminant in tale, eauses ovarian cancer in
	Page 247		Page 249
1	THE WITNESS: Again, I would want to see	1	women."
2	her document, her report in order to discuss this	2	Did I read that correctly?
3	issue.	3	A You did read that correctly, yes.
4	BY MR. MEADOWS:	4	
		4	Q Do you stand by that today?
5	Q And she also called into question the	5	Q Do you stand by that today?A I do.
5 6	Q And she also called into question the expertise of the panel that that reviewed		
		5	A I do.
6	expertise of the panel that that reviewed	5 6	A I do. (Moore Exhibit No. 14 was marked
6 7	expertise of the panel that that reviewed the the data before writing the CIR report.	5 6 7	A I do. (Moore Exhibit No. 14 was marked for identification.)
6 7 8	expertise of the panel that that reviewed the the data before writing the CIR report. MR. ZELLERS: Same object	5 6 7 8	A I do. (Moore Exhibit No. 14 was marked for identification.) BY MR. MEADOWS:
6 7 8 9	expertise of the panel that that reviewed the the data before writing the CIR report. MR. ZELLERS: Same object BY MR. MEADOWS:	5 6 7 8 9	A I do. (Moore Exhibit No. 14 was marked for identification.) BY MR. MEADOWS: Q I hand you what I marked as Exhibit 14.
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6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	expertise of the panel that that reviewed the the data before writing the CIR report. MR. ZELLERS: Same object BY MR. MEADOWS: Q Do you remember seeing that in her in her report? A Again MR. ZELLERS: Same object hold on, please. Same objection. MR. LOCKE: Objection. THE WITNESS: Again, I would want to see her report in order to have this discussion. BY MR. MEADOWS: Q And she also called into question the whole review process of the CIR and and questioned how robust it actually is. Do you remember seeing that in Dr. Plunkett's report? MR. ZELLERS: Objection. Form.	5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A I do. (Moore Exhibit No. 14 was marked for identification.) BY MR. MEADOWS: Q I hand you what I marked as Exhibit 14. Do you recognize that document? A I do. Q It's the IARC report, correct, on asbestos? MR. ZELLERS: Objection. Form. Vague. THE WITNESS: Okay. So maybe the complete citation. BY MR. MEADOWS: Q I'm sorry? A So, sorry, so this is the IARC version what, just so it's clear? Q Yeah, you tell me, what is it? You're familiar with IARC, right? A I am.
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	Page 250		Page 252
1	believe.	1	"Asbestos causes mesothelioma" excuse me
2	Q Correct. IARC Monograph 100C. I think	2	"mesothelioma and cancer of the lung, larynx and
3	it's it's on at least every other page in the	3	ovary."
4	document	4	Did I read that correctly?
5	A Okay, I see it.	5	MR. LOCKE: Objection.
6	Q in the left-hand corner. Yeah.	6	MR. ZELLERS: Same objection. Form.
7	A Yeah.	7	THE WITNESS: So you read that statement
8	Q Okay. If you will join me in turning	8	correctly.
9	over to page 256.	9	BY MR. MEADOWS:
10	Look in the right-hand column, I've	10	Q Do you agree with that statement?
11	highlighted paragraph a portion of a paragraph	11	MR. ZELLERS: Objection. Form.
12	in the right-hand column. I'll read it aloud.	12	THE WITNESS: So again, the there's
13	"The working group noted that a causal	13	association between heavily exposed occupational
14	association between exposure to asbestos and	14	cohorts and ovarian cancer.
15	cancer of the ovary was clearly established based	15	BY MR. MEADOWS:
16	on fine five strongly positive cohort mortality	16	Q This says asbestos causes cancer of the
17	studies of women with heavy occupational exposure	17	ovary. Do you agree with that?
18	to asbestos."	18	MR. LOCKE: Objection.
19	Did I read that correctly?	19	MR. ZELLERS: Objection. Form, asked
20	A You did read that correctly.	20	and answered.
21	Q And that would be contrary to what your	21	THE WITNESS: Okay. So what I said was
22	statement says, right?	22	that there's an association that's been drawn
23	MR. ZELLERS: Objection. Form.	23	between asbestos exposure and heavily exposed
24	THE WITNESS: That's not what my	24	occupational cohorts and ovarian cancer.
25	statement says.	25	BY MR. MEADOWS:
	Page 251		Page 253
1	BY MR. MEADOWS:	1	Q Earlier we were having an exchange
2	Q Well, your statement says: "Scientific	2	and if we need to go back to the transcript to
3	studies do not support the theory that asbestos,	3	find it, we can but I was asking you about
4	as an alleged contaminant in talc, causes ovarian	4	asbestos testing, and you said that "They are in
5	cancer in women."	5	the materials I received," and I think you were
6	Did I read that correctly?	6	
7	A You did.		saying that they that you had produced some
	A You ald.	7	saying that they that you had produced some asbestos testing materials to us that you had
8	Q Well, do you agree with what's	7 8	
8 9			asbestos testing materials to us that you had
-	Q Well, do you agree with what's	8	asbestos testing materials to us that you had considered in your in reaching your conclusion;
9	Q Well, do you agree with what's highlighted on the screen?	8 9	asbestos testing materials to us that you had considered in your in reaching your conclusion; is that correct?
9	Q Well, do you agree with what's highlighted on the screen? A So I agree that there was an observed	8 9 10	asbestos testing materials to us that you had considered in your in reaching your conclusion; is that correct? MR. ZELLERS: Objection. Form.
9 10 11	Q Well, do you agree with what's highlighted on the screen? A So I agree that there was an observed association between heavily exposed cohorts and	8 9 10 11	asbestos testing materials to us that you had considered in your in reaching your conclusion; is that correct? MR. ZELLERS: Objection. Form. THE WITNESS: So I don't know that I
9 10 11 12	Q Well, do you agree with what's highlighted on the screen? A So I agree that there was an observed association between heavily exposed cohorts and ovarian cancer.	8 9 10 11 12	asbestos testing materials to us that you had considered in your in reaching your conclusion; is that correct? MR. ZELLERS: Objection. Form. THE WITNESS: So I don't know that I I so I received them. I don't know if I read
9 10 11 12 13	Q Well, do you agree with what's highlighted on the screen? A So I agree that there was an observed association between heavily exposed cohorts and ovarian cancer. Q Well, to be clear, it says: "The	8 9 10 11 12 13	asbestos testing materials to us that you had considered in your in reaching your conclusion; is that correct? MR. ZELLERS: Objection. Form. THE WITNESS: So I don't know that I I so I received them. I don't know if I read every document, but I received those as part of
9 10 11 12 13 14	Q Well, do you agree with what's highlighted on the screen? A So I agree that there was an observed association between heavily exposed cohorts and ovarian cancer. Q Well, to be clear, it says: "The working group noted a causal association between	8 9 10 11 12 13 14	asbestos testing materials to us that you had considered in your in reaching your conclusion; is that correct? MR. ZELLERS: Objection. Form. THE WITNESS: So I don't know that I I so I received them. I don't know if I read every document, but I received those as part of the materials
9 10 11 12 13 14 15	Q Well, do you agree with what's highlighted on the screen? A So I agree that there was an observed association between heavily exposed cohorts and ovarian cancer. Q Well, to be clear, it says: "The working group noted a causal association between exposure to asbestos and cancer of the ovary was	8 9 10 11 12 13 14 15	asbestos testing materials to us that you had considered in your in reaching your conclusion; is that correct? MR. ZELLERS: Objection. Form. THE WITNESS: So I don't know that I I so I received them. I don't know if I read every document, but I received those as part of the materials BY MR. MEADOWS:
9 10 11 12 13 14 15	Q Well, do you agree with what's highlighted on the screen? A So I agree that there was an observed association between heavily exposed cohorts and ovarian cancer. Q Well, to be clear, it says: "The working group noted a causal association between exposure to asbestos and cancer of the ovary was clearly established."	8 9 10 11 12 13 14 15	asbestos testing materials to us that you had considered in your in reaching your conclusion; is that correct? MR. ZELLERS: Objection. Form. THE WITNESS: So I don't know that I I so I received them. I don't know if I read every document, but I received those as part of the materials BY MR. MEADOWS: Q Where are those identified on your
9 10 11 12 13 14 15 16	Q Well, do you agree with what's highlighted on the screen? A So I agree that there was an observed association between heavily exposed cohorts and ovarian cancer. Q Well, to be clear, it says: "The working group noted a causal association between exposure to asbestos and cancer of the ovary was clearly established." Did I read that correctly? MR. ZELLERS: Objection. Form. MR. LOCKE: Objection.	8 9 10 11 12 13 14 15 16	asbestos testing materials to us that you had considered in your in reaching your conclusion; is that correct? MR. ZELLERS: Objection. Form. THE WITNESS: So I don't know that I I so I received them. I don't know if I read every document, but I received those as part of the materials BY MR. MEADOWS: Q Where are those identified on your reliance list?
9 10 11 12 13 14 15 16 17	Q Well, do you agree with what's highlighted on the screen? A So I agree that there was an observed association between heavily exposed cohorts and ovarian cancer. Q Well, to be clear, it says: "The working group noted a causal association between exposure to asbestos and cancer of the ovary was clearly established." Did I read that correctly? MR. ZELLERS: Objection. Form.	8 9 10 11 12 13 14 15 16 17	asbestos testing materials to us that you had considered in your in reaching your conclusion; is that correct? MR. ZELLERS: Objection. Form. THE WITNESS: So I don't know that I I so I received them. I don't know if I read every document, but I received those as part of the materials BY MR. MEADOWS: Q Where are those identified on your reliance list? A Those are in my report.
9 10 11 12 13 14 15 16 17 18	Q Well, do you agree with what's highlighted on the screen? A So I agree that there was an observed association between heavily exposed cohorts and ovarian cancer. Q Well, to be clear, it says: "The working group noted a causal association between exposure to asbestos and cancer of the ovary was clearly established." Did I read that correctly? MR. ZELLERS: Objection. Form. MR. LOCKE: Objection. THE WITNESS: So you read that statement correctly.	8 9 10 11 12 13 14 15 16 17 18	asbestos testing materials to us that you had considered in your in reaching your conclusion; is that correct? MR. ZELLERS: Objection. Form. THE WITNESS: So I don't know that I I so I received them. I don't know if I read every document, but I received those as part of the materials BY MR. MEADOWS: Q Where are those identified on your reliance list? A Those are in my report. MR. ZELLERS: He asked about your
9 10 11 12 13 14 15 16 17 18 19 20	Q Well, do you agree with what's highlighted on the screen? A So I agree that there was an observed association between heavily exposed cohorts and ovarian cancer. Q Well, to be clear, it says: "The working group noted a causal association between exposure to asbestos and cancer of the ovary was clearly established." Did I read that correctly? MR. ZELLERS: Objection. Form. MR. LOCKE: Objection. THE WITNESS: So you read that statement	8 9 10 11 12 13 14 15 16 17 18 19 20	asbestos testing materials to us that you had considered in your in reaching your conclusion; is that correct? MR. ZELLERS: Objection. Form. THE WITNESS: So I don't know that I I so I received them. I don't know if I read every document, but I received those as part of the materials BY MR. MEADOWS: Q Where are those identified on your reliance list? A Those are in my report. MR. ZELLERS: He asked about your reliance list.
9 10 11 12 13 14 15 16 17 18 19 20 21	Q Well, do you agree with what's highlighted on the screen? A So I agree that there was an observed association between heavily exposed cohorts and ovarian cancer. Q Well, to be clear, it says: "The working group noted a causal association between exposure to asbestos and cancer of the ovary was clearly established." Did I read that correctly? MR. ZELLERS: Objection. Form. MR. LOCKE: Objection. THE WITNESS: So you read that statement correctly. BY MR. MEADOWS: Q If you flip over to page 294, under the	8 9 10 11 12 13 14 15 16 17 18 19 20 21	asbestos testing materials to us that you had considered in your in reaching your conclusion; is that correct? MR. ZELLERS: Objection. Form. THE WITNESS: So I don't know that I I so I received them. I don't know if I read every document, but I received those as part of the materials BY MR. MEADOWS: Q Where are those identified on your reliance list? A Those are in my report. MR. ZELLERS: He asked about your reliance list. THE WITNESS: Oh, the reliance list?
9 10 11 12 13 14 15 16 17 18 19 20 21	Q Well, do you agree with what's highlighted on the screen? A So I agree that there was an observed association between heavily exposed cohorts and ovarian cancer. Q Well, to be clear, it says: "The working group noted a causal association between exposure to asbestos and cancer of the ovary was clearly established." Did I read that correctly? MR. ZELLERS: Objection. Form. MR. LOCKE: Objection. THE WITNESS: So you read that statement correctly. BY MR. MEADOWS:	8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	asbestos testing materials to us that you had considered in your in reaching your conclusion; is that correct? MR. ZELLERS: Objection. Form. THE WITNESS: So I don't know that I I so I received them. I don't know if I read every document, but I received those as part of the materials BY MR. MEADOWS: Q Where are those identified on your reliance list? A Those are in my report. MR. ZELLERS: He asked about your reliance list. THE WITNESS: Oh, the reliance list? MR. ZELLERS: But if it's easier to do

64 (Pages 250 to 253)

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	Page 254		Page 256
1	A I can do it on the reliance list, that's	1	MR. ZELLERS: You did a good job.
2	fine.	2	MR. MEADOWS: Taking orders from my
3	Q It may be referenced in your report on	3	boss.
4	page 5 through 7.	4	BY MR. MEADOWS:
5	A Well, I'm either way. I have my	5	Q All right. Sticking with your report, I
6	reliance list right here. It's right on top.	6	want to flip over to page 38.
7	Well, it's long. I'll just do my	7	Actually, we've already covered that.
8	report. How's that?	8	Flip over to page 40.
9	So the question was where in this	9	And the first paragraph is where I am.
10	list	10	A Okay.
11	Q We're trying we're trying to find	11	Q And actually, I think it's the third
12	where they are. I mean we're trying I don't	12	sentence is where I'm going to start from.
13	think we've received those.	13	You wrote: "Some studies showing
14	A So those were the Cook documents that	14	increased mesothelioma rates in humans
15	were cited in the Cook report from Johnson &	15	occupationally exposed to high levels of asbestos
16	Johnson documents and Imerys documents, and then	16	also observe statistically significant but much
17	the Krekeler documents cited in the report, the	17	lesser increases in ovarian cancer rates. It
18	Johnson & Johnson documents, and the Krekeler	18	follows then that if ovarian cancer is associated
19	documents cited in report, the Imerys documents.	19	with asbestos exposure, levels that are not
20	Q Tell you what, let's let me just	20	associated with mesothelioma will also not cause
21	highlight this as we go	21	ovarian cancer."
22	A Okay.	22	Did I read that correctly?
23	Q so we're on the same page. If you	23	A I believe that was read correctly.
24	don't mind starting over so I can	24	Q Okay. So my question is questions,
25	A Oh, sorry. Sorry. Okay, ready?	25	what do you mean by high level of asbesto
	Page 255		Page 257
1	Page 255 Q Yes.	1	Page 257 asbestos?
1 2		1 2	
	Q Yes.		asbestos?
2	Q Yes. A Okay. So the Cook	2	asbestos? A Okay. So let me just back up and say,
2	Q Yes.A Okay. So the CookMR. ZELLERS: So what page are you on in	2	asbestos? A Okay. So let me just back up and say, to put this into context, you missed the first
2 3 4	Q Yes. A Okay. So the Cook MR. ZELLERS: So what page are you on in the report?	2 3 4	asbestos? A Okay. So let me just back up and say, to put this into context, you missed the first sentence, which is "Dose-response is the key
2 3 4 5	Q Yes. A Okay. So the Cook MR. ZELLERS: So what page are you on in the report? BY MR. MEADOWS:	2 3 4 5	asbestos? A Okay. So let me just back up and say, to put this into context, you missed the first sentence, which is "Dose-response is the key metric for evaluating these type of results."
2 3 4 5 6	Q Yes. A Okay. So the Cook MR. ZELLERS: So what page are you on in the report? BY MR. MEADOWS: Q This is page 6. I think you're on	2 3 4 5 6	asbestos? A Okay. So let me just back up and say, to put this into context, you missed the first sentence, which is "Dose-response is the key metric for evaluating these type of results." And your question was, What was meant by
2 3 4 5 6 7	Q Yes. A Okay. So the Cook MR. ZELLERS: So what page are you on in the report? BY MR. MEADOWS: Q This is page 6. I think you're on page 6, aren't you?	2 3 4 5 6 7	asbestos? A Okay. So let me just back up and say, to put this into context, you missed the first sentence, which is "Dose-response is the key metric for evaluating these type of results." And your question was, What was meant by high levels of asbestos?
2 3 4 5 6 7 8	Q Yes. A Okay. So the Cook MR. ZELLERS: So what page are you on in the report? BY MR. MEADOWS: Q This is page 6. I think you're on page 6, aren't you? A Sorry. Yes, I am on page 6.	2 3 4 5 6 7 8	asbestos? A Okay. So let me just back up and say, to put this into context, you missed the first sentence, which is "Dose-response is the key metric for evaluating these type of results." And your question was, What was meant by high levels of asbestos? Q Mm-hmm.
2 3 4 5 6 7 8 9	Q Yes. A Okay. So the Cook MR. ZELLERS: So what page are you on in the report? BY MR. MEADOWS: Q This is page 6. I think you're on page 6, aren't you? A Sorry. Yes, I am on page 6. Q Okay. All right.	2 3 4 5 6 7 8	asbestos? A Okay. So let me just back up and say, to put this into context, you missed the first sentence, which is "Dose-response is the key metric for evaluating these type of results." And your question was, What was meant by high levels of asbestos? Q Mm-hmm. A All right. So those are high levels of
2 3 4 5 6 7 8 9	Q Yes. A Okay. So the Cook MR. ZELLERS: So what page are you on in the report? BY MR. MEADOWS: Q This is page 6. I think you're on page 6, aren't you? A Sorry. Yes, I am on page 6. Q Okay. All right. A Okay. So like two-thirds of the way	2 3 4 5 6 7 8 9	asbestos? A Okay. So let me just back up and say, to put this into context, you missed the first sentence, which is "Dose-response is the key metric for evaluating these type of results." And your question was, What was meant by high levels of asbestos? Q Mm-hmm. A All right. So those are high levels of asbestos that are associated with mesothelioma
2 3 4 5 6 7 8 9 10	Q Yes. A Okay. So the Cook MR. ZELLERS: So what page are you on in the report? BY MR. MEADOWS: Q This is page 6. I think you're on page 6, aren't you? A Sorry. Yes, I am on page 6. Q Okay. All right. A Okay. So like two-thirds of the way down maybe, "Cook documents cited in report -	2 3 4 5 6 7 8 9 10 11	asbestos? A Okay. So let me just back up and say, to put this into context, you missed the first sentence, which is "Dose-response is the key metric for evaluating these type of results." And your question was, What was meant by high levels of asbestos? Q Mm-hmm. A All right. So those are high levels of asbestos that are associated with mesothelioma development in those populations, as I define in
2 3 4 5 6 7 8 9 10 11 12	Q Yes. A Okay. So the Cook MR. ZELLERS: So what page are you on in the report? BY MR. MEADOWS: Q This is page 6. I think you're on page 6, aren't you? A Sorry. Yes, I am on page 6. Q Okay. All right. A Okay. So like two-thirds of the way down maybe, "Cook documents cited in report - Johnson & Johnson."	2 3 4 5 6 7 8 9 10 11	asbestos? A Okay. So let me just back up and say, to put this into context, you missed the first sentence, which is "Dose-response is the key metric for evaluating these type of results." And your question was, What was meant by high levels of asbestos? Q Mm-hmm. A All right. So those are high levels of asbestos that are associated with mesothelioma development in those populations, as I define in my report. We can go through each study.
2 3 4 5 6 7 8 9 10 11 12	Q Yes. A Okay. So the Cook MR. ZELLERS: So what page are you on in the report? BY MR. MEADOWS: Q This is page 6. I think you're on page 6, aren't you? A Sorry. Yes, I am on page 6. Q Okay. All right. A Okay. So like two-thirds of the way down maybe, "Cook documents cited in report - Johnson & Johnson." Q Okay. I highlighted that on the screen.	2 3 4 5 6 7 8 9 10 11 12 13	asbestos? A Okay. So let me just back up and say, to put this into context, you missed the first sentence, which is "Dose-response is the key metric for evaluating these type of results." And your question was, What was meant by high levels of asbestos? Q Mm-hmm. A All right. So those are high levels of asbestos that are associated with mesothelioma development in those populations, as I define in my report. We can go through each study. Q So you've defined "high level" in your
2 3 4 5 6 7 8 9 10 11 12 13 14	Q Yes. A Okay. So the Cook MR. ZELLERS: So what page are you on in the report? BY MR. MEADOWS: Q This is page 6. I think you're on page 6, aren't you? A Sorry. Yes, I am on page 6. Q Okay. All right. A Okay. So like two-thirds of the way down maybe, "Cook documents cited in report - Johnson & Johnson." Q Okay. I highlighted that on the screen. A Then "Cook documents cited in report -	2 3 4 5 6 7 8 9 10 11 12 13 14	asbestos? A Okay. So let me just back up and say, to put this into context, you missed the first sentence, which is "Dose-response is the key metric for evaluating these type of results." And your question was, What was meant by high levels of asbestos? Q Mm-hmm. A All right. So those are high levels of asbestos that are associated with mesothelioma development in those populations, as I define in my report. We can go through each study. Q So you've defined "high level" in your report, is that what you're saying?
2 3 4 5 6 7 8 9 10 11 12 13 14 15	Q Yes. A Okay. So the Cook MR. ZELLERS: So what page are you on in the report? BY MR. MEADOWS: Q This is page 6. I think you're on page 6, aren't you? A Sorry. Yes, I am on page 6. Q Okay. All right. A Okay. So like two-thirds of the way down maybe, "Cook documents cited in report - Johnson & Johnson." Q Okay. I highlighted that on the screen. A Then "Cook documents cited in report - Imerys."	2 3 4 5 6 7 8 9 10 11 12 13 14 15	asbestos? A Okay. So let me just back up and say, to put this into context, you missed the first sentence, which is "Dose-response is the key metric for evaluating these type of results." And your question was, What was meant by high levels of asbestos? Q Mm-hmm. A All right. So those are high levels of asbestos that are associated with mesothelioma development in those populations, as I define in my report. We can go through each study. Q So you've defined "high level" in your report, is that what you're saying? A So I'm just saying that it's a term
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	Page 258		Page 260
1	A So "high levels" are at the end of	1	A Well, again, it's general toxicology
2	the page there before the footnote starts. So,	2	practice to assess risk.
3	for example, "Asbestos cement workers, the 1971	3	Q And I'm trying again I mean, I I'm
4	average concentrations measured in the mixing and	4	trying to understand here, but I I have not
5	production areas of the asbestos cement plant were	5	heard you give me a single peer-reviewed published
6	303.8 and 13.5 fibers per cc, respectively."	6	article that that supports that statement. I
7	Q Okay. Continuing on in the same	7	have no idea what you are using to support that
8	paragraph we just read, I have a few more	8	statement.
9	questions.	9	A It's a general toxicology principle.
10	Down here at the bottom: "If ovarian	10	So, for example, if you're looking at a
11	cancer is associated with asbestos exposure,	11	carcinogenicity study and you see tumors in one or
12	levels that are not associated with mesothelioma	12	any effect, any kind of adverse effect in one
13	will also not cause ovarian cancer."	13	organ system, say at 10 milligrams per cubic or
14	What's your basis for that statement?	14	10 milligrams per kilogram dose, and then you see
15	A So the basis is risk levels.	15	another organ system that's affected at 100
16	Q Okay. Well, can you point to any	16	milligrams per kilogram as well as that one, the
17	peer-reviewed publications that support that	17	organ system that is affected that's uniquely
18	statement?	18	affected at the lower dose becomes the more
19	A So this is an analysis of peer-reviewed	19	sensitive endpoint.
20	publications.	20	Q And where does that come from? What
21	Q Okay. Well, which peer-reviewed	21	what peer-reviewed public publication says
22	publications support that statement?	22	that?
23	A So the peer-reviewed publications that	23	A That's general toxicology information.
24	are listed in this report.	24	
25	Q Okay. Can you tell me which ones they	25	Q I understand that's Moore on toxicology, but I need to know about peer-reviewed
25	Q Okay. Can you ten me which ones they	25	but I need to know about peer-reviewed
	Page 259		Page 261
1	Page 259 are?	1	Page 261 publications that support that statement.
1 2		1 2	
	are?		publications that support that statement.
2	are? A So the report demonstrates that the risk	2	publications that support that statement. MR. ZELLERS: Objection. Form.
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	Page 262		Page 264
1	All right, I think I found it.	1	in the MDL?
2	Now I'm lost again.	2	MR. ZELLERS: Same objection. Form,
3	"Assuming that the asbestos fibers were	3	foundation.
4	present at the maximum concentration alleged by	4	THE WITNESS: Again, I don't know the
5	Drs. Longo and Rigler."	5	the plaintiffs' frequency in this, but I can talk
6	Do you see that phrase that you wrote?	6	about what the case-control and cohort studies
7	A I do see that section.	7	BY MR. MEADOWS:
8	Q What level are you referring to?	8	Q What's your understanding of the
9	A So that level is a is the number	9	duration of the exposure of the plaintiffs in the
10	the maximum number of structures that Drs. Longo	10	MDL?
11	and Rigler identified in their report in a bottle	11	MR. ZELLERS: Objection. Form,
12	of Johnson's Baby Powder or Shower to Shower.	12	foundation.
13	Q Now, are you referring to exposure by	13	THE WITNESS: Again, I don't know the
14	inhalation here?	14	plaintiffs in this case. I'm just evaluating what
15	A So so so in that sentence?	15	the scientific dataset is.
16	Q Well, in that that whole section.	16	BY MR. MEADOWS:
17	A This whole section?	17	Q And what's your understanding of the
18	Q Yes.	18	amount used per application by the plaintiffs in
19	A Yes, that is inhalation exposure.	19	the MDL?
20	Q How about genital application?	20	MR. ZELLERS: Same objections.
21	A That was not considered. This was in	21	THE WITNESS: Again well, I don't
22	comparison to the heavily exposed studies that	22	think I've said there before, but dose is I
23	were identified.	23	I don't know the plaintiffs. I don't know what
24	Q Okay. So you're not considering	24	the I don't
25	genital genital application here.	25	BY MR. MEADOWS:
	Daga 263		
1	Page 263	1	Page 265
1	MR. ZELLERS: Objection. Form.	1 2	Q You don't know.
2	MR. ZELLERS: Objection. Form. THE WITNESS: So so this was a	2	Q You don't know. A The dose
2 3	MR. ZELLERS: Objection. Form. THE WITNESS: So so this was a comparison to the heavily exposed occupational	2 3	Q You don't know.A The doseQ You don't have any
2 3 4	MR. ZELLERS: Objection. Form. THE WITNESS: So so this was a comparison to the heavily exposed occupational cohorts.	2 3 4	 Q You don't know. A The dose Q You don't have any A The dose is is a shortcoming of a lot
2 3 4 5	MR. ZELLERS: Objection. Form. THE WITNESS: So so this was a comparison to the heavily exposed occupational cohorts. BY MR. MEADOWS:	2 3 4 5	Q You don't know. A The dose Q You don't have any A The dose is is a shortcoming of a lot of the or all of the case-control and cohort
2 3 4 5 6	MR. ZELLERS: Objection. Form. THE WITNESS: So so this was a comparison to the heavily exposed occupational cohorts. BY MR. MEADOWS: Q Yeah. So typically don't have much	2 3 4	Q You don't know. A The dose Q You don't have any A The dose is is a shortcoming of a lot of the or all of the case-control and cohort studies.
2 3 4 5 6 7	MR. ZELLERS: Objection. Form. THE WITNESS: So so this was a comparison to the heavily exposed occupational cohorts. BY MR. MEADOWS: Q Yeah. So typically don't have much genital application in the occupational setting,	2 3 4 5 6 7	Q You don't know. A The dose Q You don't have any A The dose is is a shortcoming of a lot of the or all of the case-control and cohort studies. Q Okay. Well, that's not what I asked
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H. Nadia Moore, Ph.D.

2 cancer. 2 docu 3 MR. MEADOWS: Move to strike, 3 A 4 nonresponsive. 4 Q 5 BY MR. MEADOWS: 5 down	Dr. Moore, are you familiar with this
2 cancer. 2 docur 3 MR. MEADOWS: Move to strike, 3 A 4 nonresponsive. 4 C 5 BY MR. MEADOWS: 5 down 6 Q All right. Going on down. 6 talks	
4 nonresponsive. 4 Q 5 BY MR. MEADOWS: 5 dowr 6 Q All right. Going on down. 6 talks	ment?
4 nonresponsive. 4 Q 5 BY MR. MEADOWS: 5 dowr 6 Q All right. Going on down. 6 talks	It appears to be a website from OSHA.
5 BY MR. MEADOWS: 5 down 6 Q All right. Going on down. 6 talks	Okay. And in this document, if you go
6 Q All right. Going on down. 6 talks	, you'll see it's entitled "Asbestos" and
	about what asbestos is.
	If you go down, "What can be done to
8 PEL, for asbestos fibers is more than 4,000 times 8 reduc	e hazards of asbesto asbestos?"
9 higher than alleged asbestos exposure from talc." 9	Look right here that I highlighted
	dy. It says: "There is no safe level of
·	tos exposure for any type of asbestos fiber."
12 MR. MEADOWS: Same page, 43.	Did I read that correctly?
	You did read that correctly.
· · · · · · · · · · · · · · · · · · ·	Do you agree with that?
15 BY MR. MEADOWS: 15	MR. ZELLERS: Objection. Form.
16 Q What alleged exposure are you referring 16	THE WITNESS: So, I do not agree with
17 to? 17 that.	2, 2, 2, 2, 2, 2, 2, 2, 2, 2, 2, 2, 2, 2
18 A The exposure that that occurs 18	There are background levels of asbestos
The state of the s	where that we're all being exposed to.
20 and Rigler found in any of the analysis of bottles 20	(Moore Exhibit No. 16 was marked
21 of Johnson's Baby Powder and Shower to Shower upon 21	for identification.)
or commons Budy Toward and Shower to Shower upon	MR. MEADOWS:
== doing that with the emperate documentons that I	I show you what's been marked as
and I made on the subsequent pages.	tiffs' 16.
25 there's a safe level of asbestos exposure? 25 A	
and the satisfies of the second states of the secon	111111111111111111111111111111111111111
Page 267	Page 269
1 MR. ZELLERS: Objection. Form. 1 Q	Are you familiar with that document?
2 THE WITNESS: So OSHA has set the 2 A	I don't know if I've seen this before or
3 permissible exposure limit, the PEL, to be 3 not.	
4 protective of workers. 4 Q	Okay. Are you familiar with NIOSH?
5 BY MR. MEADOWS: 5 A	I do know what NIOSH is.
6 Q So you're saying that OSHA has said 6 Q	Okay. What does it stand for?
	So National Institute of Occupational
AD ZELLEDG OL: C E	and Health.
8 MR. ZELLERS: Objection. Form. 8 Safety	Cothigia a NIOCII mata might?
9 THE WITNESS: I'm saying that at that 9 Q	So this is a NIOSH note, right?
1	MR. ZELLERS: Objection. Form,
9 THE WITNESS: I'm saying that at that 9 Q	MR. ZELLERS: Objection. Form,
9 THE WITNESS: I'm saying that at that 9 Q 10 level, there's been no associations with increased 10	MR. ZELLERS: Objection. Form,
9 THE WITNESS: I'm saying that at that 9 Q 10 level, there's been no associations with increased 10 11 disease. 11 found	MR. ZELLERS: Objection. Form, ation. THE WITNESS: That's what the document
9 THE WITNESS: I'm saying that at that 9 Q 10 level, there's been no associations with increased 10 11 disease. 11 found 12 BY MR. MEADOWS: 12 13 Q What level is that? 13 title is	MR. ZELLERS: Objection. Form, ation. THE WITNESS: That's what the document
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9 THE WITNESS: I'm saying that at that 10 level, there's been no associations with increased 11 disease. 11 found 12 BY MR. MEADOWS: 13 Q What level is that? 14 A 0.1 structures per cc as an eight-hour 15 time-weighted average. 10 11 found 12 13 title is	MR. ZELLERS: Objection. Form, ation. THE WITNESS: That's what the document
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9 THE WITNESS: I'm saying that at that 10 level, there's been no associations with increased 11 disease. 11 found 12 BY MR. MEADOWS: 13 Q What level is that? 14 A 0.1 structures per cc as an eight-hour 15 time-weighted average. 16 (Moore Exhibit No. 15 was marked 16 highli 17 for identification.) 18 BY MR. MEADOWS: 19 Q I show you what has been marked as 20 what? 21 MR. ZELLERS: Do you have copies? Oh, 22 okay. Sorry. That's okay. 23 asbest 24 MR. MEADOWS: P-15.	MR. ZELLERS: Objection. Form, ation. THE WITNESS: That's what the document R. MEADOWS: Okay. Let's just read what's ghted here. "Findings of joint NIOSH/OSHA work group rning health effects of asbestos. At a news ag in Washington on April 17, 1980, the gs of a joint NIOSH/OSHA work group were need concerning the group's review of recent iffic information about the health effects of

68 (Pages 266 to 269)

i	Page 270		Page 272
1	And there are others who were present as	1	testified she hadn't seen this before.
2	well. If you go down it says what doctor wrote	2	THE WITNESS: As I say, it's 1980. I
3	Dr. Robbins said the group had confirmed, and it	3	don't I'd have to read the context behind all
4	says: "They confirmed there is no safe exposure	4	the statements and what was the state of the
5	limit for asbestos."	5	science at that time.
6	Did I read that correctly?	6	BY MR. MEADOWS:
7	A You did read that correctly.	7	Q So you disagree with OSHA and NIOSH, at
8	Q And if you go over to the right, I've	8	least according to what they said in 1980. Right?
9	got more highlights over here.	9	MR. ZELLERS: Objection.
10	It says: "The group reconfirmed that	10	MR. LOCKE: Objection.
11	there is no safe exposure level for asbestos.	11	MR. ZELLERS: Form. Misstates the
12	Although the data suggests that lower exposure	12	evidence.
13	results lower exposures result in a lower risk	13	BY MR. MEADOWS:
14	of developing cancer, there is no known level	14	Q Is that right?
15	below which asbestos-related disease do not	15	A Is there a question pending? I missed
16	occur."	16	it.
17	Did I read that correctly?	17	Q I'm just asking you. I mean, I you
18	A You did read that correctly.	18	disagree with OSHA and NIOSH in what they stated
19	Q Do you agree or disagree with the	19	in 1980, right?
20	statements that I just read?	20	MR. ZELLERS: Objection. Form.
21	MR. ZELLERS: Objection. Form.	21	Misstates the evidence.
22	THE WITNESS: So this is 1980. I point	22	THE WITNESS: So I agree there's a
23	that out and	23	threshold for asbestos-related disease.
24	BY MR. MEADOWS:	24	BY MR. MEADOWS:
25	Q And that's significant why?	25	Q Okay. So you disagree with OSHA, NIOSH,
	Page 271		Page 273
1	A It was a long time ago.	1	you disagree with Health Canada, you disagree with
2	Q Yeah.	2	FDA, you disagree with a host of experts who have
3	A Yeah. So science evolves every year.	3	written and been published on the subject of talc
4	I scientific datasets, first of all, cannot	4	and ovarian cancer.
5	prove a negative, so you can't prove that exposure		
	prove a negative, so you can't prove that exposure	5	Is there anybody that you do agree with?
6	doesn't cause a disease. You can only observe	5 6	Is there anybody that you do agree with? MR. ZELLERS: Objection. Form.
6 7			, , ,
	doesn't cause a disease. You can only observe	6	MR. ZELLERS: Objection. Form.
7	doesn't cause a disease. You can only observe make observations. There are ambient asbestos exposures that everyone is exposed to on a daily basis,	6 7	MR. ZELLERS: Objection. Form. BY MR. MEADOWS: Q Who says that talc is related to ovarian cancer?
7 8	doesn't cause a disease. You can only observe make observations. There are ambient asbestos exposures that everyone is exposed to on a daily basis, without disease occurring. There's thresholds for	6 7 8	MR. ZELLERS: Objection. Form. BY MR. MEADOWS: Q Who says that talc is related to ovarian cancer? MR. ZELLERS: Objection. Form,
7 8 9	doesn't cause a disease. You can only observe make observations. There are ambient asbestos exposures that everyone is exposed to on a daily basis,	6 7 8 9	MR. ZELLERS: Objection. Form. BY MR. MEADOWS: Q Who says that talc is related to ovarian cancer?
7 8 9 10	doesn't cause a disease. You can only observe make observations. There are ambient asbestos exposures that everyone is exposed to on a daily basis, without disease occurring. There's thresholds for	6 7 8 9 10	MR. ZELLERS: Objection. Form. BY MR. MEADOWS: Q Who says that talc is related to ovarian cancer? MR. ZELLERS: Objection. Form,
7 8 9 10 11	doesn't cause a disease. You can only observe make observations. There are ambient asbestos exposures that everyone is exposed to on a daily basis, without disease occurring. There's thresholds for exposures. There's thresholds for there's	6 7 8 9 10 11	MR. ZELLERS: Objection. Form. BY MR. MEADOWS: Q Who says that talc is related to ovarian cancer? MR. ZELLERS: Objection. Form, argumentative, misstates the evidence.
7 8 9 10 11 12	doesn't cause a disease. You can only observe make observations. There are ambient asbestos exposures that everyone is exposed to on a daily basis, without disease occurring. There's thresholds for exposures. There's thresholds for there's thresholds for exposures that generate responses.	6 7 8 9 10 11 12	MR. ZELLERS: Objection. Form. BY MR. MEADOWS: Q Who says that talc is related to ovarian cancer? MR. ZELLERS: Objection. Form, argumentative, misstates the evidence. THE WITNESS: My task in this in this
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7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	doesn't cause a disease. You can only observe make observations. There are ambient asbestos exposures that everyone is exposed to on a daily basis, without disease occurring. There's thresholds for exposures. There's thresholds for there's thresholds for exposures that generate responses. So, and NIOSH is a regulatory organization that's charged with protecting the public. So so I and I believe there is a threshold for disease with asbestos. Q What's that based on? What's your belief based on? A The belief is based on on no no increased rates of disease with the occupational exposure limit of 0.1 structures per cc.	6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	MR. ZELLERS: Objection. Form. BY MR. MEADOWS: Q Who says that talc is related to ovarian cancer? MR. ZELLERS: Objection. Form, argumentative, misstates the evidence. THE WITNESS: My task in this in this work was to do an independent evaluation of the scientific dataset to evaluate the relationship between talc and ovarian cancer. And in doing so, I concluded that the scientific data does not support a causal relationship between the perineal use of talc and ovarian cancer. BY MR. MEADOWS: Q Right. You disagree with OSHA, NIOSH, FDA, Health Canada, and a laundry list of people
7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	doesn't cause a disease. You can only observe make observations. There are ambient asbestos exposures that everyone is exposed to on a daily basis, without disease occurring. There's thresholds for exposures. There's thresholds for there's thresholds for exposures that generate responses. So, and NIOSH is a regulatory organization that's charged with protecting the public. So so I and I believe there is a threshold for disease with asbestos. Q What's that based on? What's your belief based on? A The belief is based on on no no increased rates of disease with the occupational exposure limit of 0.1 structures per cc. Q And what do you just think that in	6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	MR. ZELLERS: Objection. Form. BY MR. MEADOWS: Q Who says that talc is related to ovarian cancer? MR. ZELLERS: Objection. Form, argumentative, misstates the evidence. THE WITNESS: My task in this in this work was to do an independent evaluation of the scientific dataset to evaluate the relationship between talc and ovarian cancer. And in doing so, I concluded that the scientific data does not support a causal relationship between the perineal use of talc and ovarian cancer. BY MR. MEADOWS: Q Right. You disagree with OSHA, NIOSH, FDA, Health Canada, and a laundry list of people who published on this topic. Right?

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	Page 274		Page 276
1	argumentative.	1	Mr. Meadows
2	THE WITNESS: Again, that's not what I	2	BY MR. MEADOWS:
3	said. I said my my task was to do an	3	Q I'm not asking for that. I'm not asking
4	independent evaluation of the scientific dataset.	4	for you to go through your statement.
5	BY MR. MEADOWS:	5	MR. ZELLERS: You are asking.
6	Q Okay. Going back to page 43.	6	BY MR. MEADOWS:
7	Next bullet point: "The lowest	7	Q I'm asking you just to give me one
8	cumulative tremolite asbestos concentration	8	one citation.
9	associated with mesothelioma is more than 29,000	9	MR. MEADOWS: And she can't seem to do
10	times higher than alleged asbestos exposure from	10	it.
11	talc."	11	MR. ZELLERS: It's
12	Did I read that correctly?	12	MR. MEADOWS: All right. We'll move on.
13	A Yes, you did.	13	MR. ZELLERS: Okay.
14	Q What's your citation for that statement?	14	BY MR. MEADOWS:
15	A So the citation there's multiple	15	Q Now, with respect to this statement,
16	citations, but it's the analysis that's contained	16	what are you referring to in terms of talc
17	in the subsequent pages of my report.	17	exposure?
18	Q You can't point me to a citation or two	18	A I flipped my page. Sorry. What page
19	or three that supports that statement?	19	are we on?
20	A So, I mean the the anal we can go	20	Q Same bullet point.
21	through the analysis and go through each of the	21	MR. ZELLERS: 43.
22	Q I'm not asking for your analysis. I'm	22	BY MR. MEADOWS:
23	asking for you to give me a citation that supports		
24	that statement. Can you give me one?	23	Q 43.
25	MR. ZELLERS: Objection. Form.		A So the alleged asbestos exposure is
23	Wik. ZEEEEKS. Objection, Torni.	25	again based on the highest concentration of
	Page 275		Page 277
1	Go through your report and do it.	1	structures that were identified in any one bottle
2	THE WITNESS: Okay.	2	of baby powder from Dr. Longo and Rigler's expert
3	BY MR. MEADOWS:	3	report. And those were converted into airborne
4	Q I'm not asking you to go through your	4	concentrations.
5	report. I'm asking you to tell me, do you have a	5	BY MR. MEADOWS:
6	citation for that particular bullet point?	6	Q Okay. So you're talking in terms of
7	A So there's	7	inhalation here, right?
8	Q I don't see one. Do you have one?	8	A This analysis is in terms of inhalation.
9	A So there's many citations in the report,	9	Q You're not talking in terms of perineal
10	and you have to go through them all in order to	10	application here, are you?
11	get to that	11	A This analysis was inhalation in order to
12	Q Okay. So	12	compare it to the heavily exposed cohorts that had
13	A That's that's a conclusion that's	13	observed an association with ovarian cancer.
14	reached through through the next subsequent	14	Q Okay. All right. Let's go to page 45.
15	pages.	15	And there's a section there at the
16	Q Okay. So if we look through your report	16	bottom: "Converting Dr. Longo and Rigler's bulk
17	and the next subsequent pages, we will find a	17	measurements to airborne concentrations."
18	citation that supports that statement. Is that	18	Did I read that correctly?
19	what you're saying?	19	A Yes, sir, you did.
20	A You will find multiple citations that	20	Q And what was your purpose in evaluating
21	that support the basis of that statement.	21	air airborne exposure?
22	Q You just can't tell me off the top of	22	A It's to understand the concentration of
	your head one that supports that statement.	23	asbestos that could allegedly be in the air,
	voui neau one mai suddons mai statement.	1 L)	assesses mai could anegettly be ill tile all,
23 24		24	assuming the the largest number of structures
23 24 25	MR. ZELLERS: Objection. Form. Please do take the time and give	24 25	assuming the the largest number of structures that were reported by Dr Drs. Longo and

1	Page 278		Page 280
1	Rigler.	1	section of your report.
2	Q And when did you undertake the	2	A The this section of my report was an
3	calculations that are found in here?	3	inhalation an exercise to understand the
4	A During the time I wrote my report.	4	inhalation concentrations in order to relate that
5	Q Did anybody assist you in that regard?	5	to the heavy asbestos exposures of the
6	A I did the calculations; other people	6	occupational cohorts.
7	reviewed them.	7	Q So did you do did you ever consider
8	Q Who did the reviewing?	8	or assume that talcum powder, with all of its
9	A I don't recall. I know Dr. Robbins, an	9	constituents including asbestos, and or the
10	industrial hygienist, reviewed them as well.	10	potential for asbestos and heavy metals, did you
11	Q Dr. Robbins works at Veritox?	11	ever assume that talcum powder does reach the
12	A Yes.	12	ovaries in any of your calculations?
13	Q Again, did you mention him as somebody	13	MR. ZELLERS: Objection. Form.
14	who's been billing for this?	14	THE WITNESS: So I guess let me read
15	A No, I had forgotten that those are the	15	the question.
16	only section that they looked at.	16	BY MR. MEADOWS:
17	Q And what Dr. Robbins how long has he	17	Q You want me to try to restate it
18	been at Veritox?	18	reask it?
19	A It's a she. Longer than I have.	19	A Yeah. Yeah, if you would reask it.
20	Q Do you have any notes pertaining to your	20	Q Okay. Assume that talcum powder with
21	calculations in that regard?	21	all its constituents reach reaches the ovaries,
22	A No, I don't believe so.	22	have you done any calculations that are relevant
23	Q Were there drafts of efforts to do the	23	to the amount that reaches the ovary?
24	calculations?	24	MR. ZELLERS: Objection. Form.
25	MR. ZELLERS: Objection.	25	THE WITNESS: So I guess I still don't
	Page 279		Page 281
1	Are the calculations part of the report	1	understand the hypothetical.
2	or are they separate?	2	BY MR. MEADOWS:
3	THE WITNESS: Yeah, they're they're	3	Q Well, all of these calculations that
4	in the report.		
	•	4	you've done, they've been done in the context of
5	MR. ZELLERS: Okay. Then I'm going to	5	you've done, they've been done in the context of airborne exposure, right?
5 6	•		you've done, they've been done in the context of airborne exposure, right? A This section was an exercise in the
	MR. ZELLERS: Okay. Then I'm going to instruct her not to talk about drafts as they're drafts that are part of the report.	5	you've done, they've been done in the context of airborne exposure, right?
6	MR. ZELLERS: Okay. Then I'm going to instruct her not to talk about drafts as they're	5 6	you've done, they've been done in the context of airborne exposure, right? A This section was an exercise in the
6 7	MR. ZELLERS: Okay. Then I'm going to instruct her not to talk about drafts as they're drafts that are part of the report.	5 6 7	you've done, they've been done in the context of airborne exposure, right? A This section was an exercise in the inhalation exposure to compare that to inhalation
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1 maximum concentration that Drs. Longo and Rigler 2 had reported in any one bottle of Johnson's Baby 3 Powder or Shower to Shower. 4 Q Going back to your calculations. Were 5 Q Going back to your calculations. Were 6 Q Going back to your calculations.	
Powder or Shower to Shower. 3 or the shower and shower Sl Q Going back to your calculations. Were 4 its propensity to cause ovarian	n the bottle, and
4 Q Going back to your calculations. Were 4 its propensity to cause ovarian	to the baby powder
	nower to Shower and
F 4 1 1 1 1 4 1 F DYAD MEADOWG	cancer.
5 there any calculations that were done or at least 5 BY MR. MEADOWS:	
6 undertaken but not included in the report? 6 Q So my question is, do	you have any
7 A No. 7 opinions regarding the presence	e of fibrous talc in
8 Q What is the background level of 8 baby powder?	
9 anthophyllite? 9 MR. ZELLERS: Objec	tion. Form.
10 MR. ZELLERS: Objection. Form. 10 THE WITNESS: So, as	gain, I just I
11 THE WITNESS: So I addressed the 11 evaluated what was in the bab	powder bottles and
12 background level of asbestos. 12 the Shower to Shower that had	been used in the
13 BY MR. MEADOWS: 13 marketplace.	
14 Q Well, did you look at the background 14 BY MR. MEADOWS:	
levels of the different types of asbestos?	rous talc is?
16 A So the background level of asbestos 16 A I do.	
17 includes all types of asbestos. 17 Q Is fibrous talc found in	baby powder?
18 Q Specifically anthophyllite, did you look 18 MR. ZELLERS: Objective 18	
19 at that? 19 Foundation.	
20 MR. ZELLERS: Objection. Form. 20 THE WITNESS: So I -	- to be honest, I
21 THE WITNESS: So I would if you want 21 evaluated the powder that exis	ted in the bottle,
to pull out the publication that I used to 22 and probably better one of the	
23 BY MR. MEADOWS: 23 this matter would be better acc	-
Q No, I didn't ask you that. I just asked 24 versed to tell you the the ma	keup of the powder
you if you looked at the background level of 25 that was in the bottles that I ev	
, , ,	
Page 283	Page 285
1 anthophyllite. 1 BY MR. MEADOWS:	
2 A I'm just saying I I can't remember 2 Q So you evaluated son	ne powders in in
3 off the top of my head. I'd have to look at that 3 bottles?	
of the top of my near 14 may to food at that	
4 publication to make that distinction. 4 A So I evaluated the evi	dence for the
4 publication to make that distinction. 4 A So I evaluated the evi	e consumers. No, I
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4 publication to make that distinction. 4 A So I evaluated the evidence of the products that were used by the products that were used by the products that were used by the didn't personally evaluate any MR. ZELLERS: Objection. Form. 7 Q Okay. So who do I need that publication to understand the the products that were used by the didn't personally evaluate any Q Okay. So who do I need that publication to understand the the products that were used by the didn't personally evaluate any Q Okay. So who do I need that publication to understand the the products that were used by the didn't personally evaluate any Q Okay. So who do I need that publication to understand the the products that were used by the didn't personally evaluate any Q Okay. So who do I need that publication to understand the the products that were used by the didn't personally evaluate any Q Okay. So who do I need that publication to understand the the products that were used by the didn't personally evaluate any Q Okay. So who do I need that publication to understand the the products that were used by the didn't personally evaluate any Q Okay. So who do I need that publication to understand the the products that were used by the didn't personally evaluate any Q Okay. So who do I need that publication to understand the the products that were used by the	e consumers. No, I powder. eed to talk to that lie, I read their
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4 publication to make that distinction. 5 Q So if you did do it, it would be 6 reflected in your report? 6 didn't personally evaluate any 7 MR. ZELLERS: Objection. Form. 8 THE WITNESS: Again, I'd have to look at 9 that publication to understand the the 10 intricacies of your question. 11 BY MR. MEADOWS: 12 Q What's the background level of 13 tremolite? 14 MR. ZELLERS: Same objection. Form. 15 THE WITNESS: So there's different types 16 of tremolite. There's tremolite and then there's 17 tremolite asbestos. 18 THE WITNESS: So I MR. ZELLERS: Objection. 19 General asbestos. 10 Pyou defer to them on fibrous talc in baby powder? 11 The witness: So there's different types 12 Defendent types 13 THE WITNESS: So there's different types 14 The witness: So there's different types 15 THE WITNESS: So there's different types 16 Defendent the other as to whether or not the asbestos concentration as background as 18 talc in baby powder as you si 19 general asbestos. 19 MR. ZELLERS: Objection THE WITNESS: So I	e consumers. No, I r powder. eed to talk to that lie, I read their whether there's , this is based on ts for the baby he market. I opinion one way or there's fibrous t here today? ction. Form. don't want to
4 publication to make that distinction. 5 Q So if you did do it, it would be 6 reflected in your report? 6 didn't personally evaluate any 7 MR. ZELLERS: Objection. Form. 7 Q Okay. So who do I n 8 THE WITNESS: Again, I'd have to look at 9 that publication to understand the the 10 intricacies of your question. 11 BY MR. MEADOWS: 12 Q What's the background level of 13 tremolite? 14 MR. ZELLERS: Same objection. Form. 15 THE WITNESS: So there's different types 16 didn't personally evaluate any 7 Q Okay. So who do I n 8 you're referring to? 9 A So, Dr. Dyar, Dr. Wy 10 reports. 11 Q You defer to them on 12 powder tremolite? 13 A So again, my opinion 14 MR. ZELLERS: Same objection. Form. 15 THE WITNESS: So there's different types 16 of tremolite. There's tremolite and then there's 17 tremolite asbestos. The background I reported 18 the asbestos concentration as background as 19 general asbestos. 19 MR. ZELLERS: Obje 20 BY MR. MEADOWS: 21 Q Do you have any opinions regarding the 21 speculate. That's not part of 10 speculate. That's not part of 10 speculate.	e consumers. No, I r powder. eed to talk to that lie, I read their whether there's , this is based on ts for the baby he market. I opinion one way or there's fibrous t here today? ction. Form. don't want to
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ou sit here today as to whether or not baby owder has fibrous talc in it? MR. ZELLERS: Objection. Form. THE WITNESS: Again, I evaluated the roduct that was in the bottle. Y MR. MEADOWS: Q And you determined there is or is not brous talc in the bottle? A So I de I looked at the scientific vidence of the material that was in the bottle to ause perineal use of the material that was in the bottle to cause ovarian cancer. Q Would you agree with me or would you gree that chromium is listed as a known human arcinogen by NTP and IARC? MR. ZELLERS: Objection. Form. THE WITNESS: So when we talk about arromium, you need to be specific as to the the orm that you're specifying. Y MR. MEADOWS: Q Well, would you agree with me that arromium, regardless of its form, is is listed as a known human carcinogen by NTP and IARC? MR. ZELLERS: Objection. Form.	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25	concluded that chromium 6 is a Group 1 carcinogen. BY MR. MEADOWS: Q The only way you could confirm if it's carcinogenic to the ovary would be to expose it to the ovary, right? MR. ZELLERS: Objection. Form, foundation. THE WITNESS: That's not how carcinogenicity studies occur. BY MR. MEADOWS: Q Well, it would be unethical to put a carcinogen in a human, wouldn't it? MR. ZELLERS: Objection. Form, foundation. THE WITNESS: When I test or when toxicologists test for carcinogenic action, we use animal models, which is what was done with chromium. BY MR. MEADOWS: Q Yep. And so in order to make a determination as to whether or not it's specifically carcinogenic to the ovary, then you would have to subject it to the ovary to make that final determination, wouldn't you? MR. ZELLERS: Objection. Form.
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Y MR. MEADOWS: Q Well, would you agree with me that nromium, regardless of its form, is is listed s a known human carcinogen by NTP and IARC?	21 22 23 24	determination as to whether or not it's specifically carcinogenic to the ovary, then you would have to subject it to the ovary to make that final determination, wouldn't you?
Q Well, would you agree with me that nromium, regardless of its form, is is listed s a known human carcinogen by NTP and IARC?	22 23 24	determination as to whether or not it's specifically carcinogenic to the ovary, then you would have to subject it to the ovary to make that final determination, wouldn't you?
nromium, regardless of its form, is is listed s a known human carcinogen by NTP and IARC?	23 24	would have to subject it to the ovary to make that final determination, wouldn't you?
s a known human carcinogen by NTP and IARC?	24	would have to subject it to the ovary to make that final determination, wouldn't you?
		final determination, wouldn't you?
	25	
•		3
Page 287		Page 289
THE WITNESS: Again, I do know that	1	Foundation.
lance state we need to discern the valence	2	THE WITNESS: So in carcinogenicity
ate that you're talking about chromium.	3	studies, in cancer studies, we dose animals and
Y MR. MEADOWS:	4	evaluate all organs for effects. There's systemic
Q How about positive 6, is it listed as a	5	doses of the test article, like chromium 6, to the
nown human carcinogen by NTP and IARC?	6	animals, and then we evaluate where in the animal,
A Chromium 6 is a known carcinogen listed	7	which organs are affected, and it depends on the
a Group 1 carcinogen by IARC.	8	test article which organs are affected.
Q If you go to page 50 of your report.	9	BY MR. MEADOWS:
nder the section of "Chromium Key Opinions," you	10	Q Do you agree that cobalt is listed as a
y: "No association has been found between	11	possible human carcinogen by IARC?
romium and ovarian cancer in humans or animals."	12	A So IARC has different carcinogenicity
Did I read that correctly?	13	ratings based on what type of cobalt the exposure
A Correct.	14	is to.
Q Are you saying that chromium is not	15	Q Right. And specifically, cobalt is
rcinogenic?	16	listed as a possible human carcinogen by IARC and
MR. ZELLERS: Objection. Form.	17	as being reasonably anticipated to be a human
isstates the evidence.	18	carcinogen by NTP, right?
THE WITNESS: That's not what I said.	19	MR. ZELLERS: Objection. Form,
Y MR. MEADOWS:	20	foundation.
0 17 4 7170 13700 1	21	THE WITNESS: Cobalt metal without
Q You agree that IARC and NTP have found	22	tungsten carbide is possibly carcinogenic by IARC,
Q You agree that IARC and NTP have found aromium to be carcinogenic, correct?	23	a Group 2B. Cobalt sulfate and other soluble
	I	-
romium to be carcinogenic, correct?	24	cobalts(II) salts are possibly carcinogenic to
1	romium and ovarian cancer in humans or animals." Did I read that correctly? A Correct. Q Are you saying that chromium is not reinogenic? MR. ZELLERS: Objection. Form. isstates the evidence. THE WITNESS: That's not what I said. MR. MEADOWS: Q You agree that IARC and NTP have found romium to be carcinogenic, correct? MR. ZELLERS: Objection. Form.	romium and ovarian cancer in humans or animals." Did I read that correctly? A Correct. Q Are you saying that chromium is not recinogenic? MR. ZELLERS: Objection. Form. Isstates the evidence. THE WITNESS: That's not what I said. MR. MEADOWS: Q You agree that IARC and NTP have found romium to be carcinogenic, correct?

	Page 290		Page 292
1	Group 2B. And cobalt metal with tungsten	1	Q Okay. Now, I want to go to
2	carbon carbide is probably carcinogenic to	2	Dr. Crowley's report.
3	humans as determined by IARC, and its	3	(Counsel conferring.)
4	classification is Group 2A.	4	MR. MEADOWS: Give us just a minute.
5	BY MR. MEADOWS:	5	We've gotten some I think some typos here that
6	Q Nickel, page 62 of your report, and you	6	have me confused.
7	say: "No association has been found between	7	Okay. All right.
8	exposure to nickel and ovarian cancer in animals	8	BY MR. MEADOWS:
9	or humans." Right?	9	Q So with respect with reference to
10	A Yes, that's the statement.	10	Dr. Crowley, I want to ask you some questions
11	Q Nickel is listed as a known human	11	about that, and I have Dr. Crowley's report here,
12	carcinogen by IARC and by NTP, right?	12	which I assume you've read, right?
13	MR. ZELLERS: Objection. Form.	13	A I have read his report.
14	Foundation.	14	Q You spent a lot of time responding to
15	THE WITNESS: So nickel compounds in	15	his report, right?
16	general are listed as a Group 1 carcinogenic to	16	A So I critiqued the methods that he used
17	humans by R by IARC.	17	in his report.
18	BY MR. MEADOWS:	18	Q So now we're you're willing to use
19	Q All right.	19	the word "critique"?
20	THE WITNESS: Is now a good time for a	20	A Well
21	break or	21	MR. ZELLERS: Objection. Form.
22	MR. MEADOWS: If you need a break,	22	BY MR. MEADOWS:
23	that's fine.	23	Q Okay. I like the word "critique"
24	THE WITNESS: Is that okay?	24	because I think that's exactly what you did
25	MR. MEADOWS: Sure. Sure.	25	A Well
	Page 291		Page 293
1	THE VIDEOGRAPHER: The time is 4:40 p.m.	1	MR. ZELLERS: Well, hold on. There's no
2	We're going off the record.	2	question.
3	(Recess.)	3	BY MR. MEADOWS:
4	THE VIDEOGRAPHER: The time is 5:00	4	Q as opposed to respond.
5	p.m., and we're back on the record.	5	MR. ZELLERS: No question.
6	BY MR. MEADOWS:	6	BY MR. MEADOWS:
7	Q All right. We'll go back to your	7	Q So, yes, you did spend a lot of time
8	report, page 87.	8	critiquing Dr. Crowley's report, along with a
9	Go down here to under "Science-based	9	number of the other experts.
10	Concerns." "Opinions by some of plaintiffs'	10	And that's what you did here when you
1 1 1			The state of the s
11	experts that any exposure to a carcinogen can	11	said: "A number of plaintiffs' experts, including
12	cause cancer are not consistent with generally	12	said: "A number of plaintiffs' experts, including Dr. Crowley, take the position that it would be
12 13	cause cancer are not consistent with generally accepted methods used by toxicologists to analyze	12 13	said: "A number of plaintiffs' experts, including Dr. Crowley, take the position that it would be it would suffice to establish that talcum powder
12 13 14	cause cancer are not consistent with generally accepted methods used by toxicologists to analyze and assess risk to human health."	12 13 14	said: "A number of plaintiffs' experts, including Dr. Crowley, take the position that it would be it would suffice to establish that talcum powder or its alleged constituents are carcinogenic
12 13 14 15	cause cancer are not consistent with generally accepted methods used by toxicologists to analyze and assess risk to human health." And then under that let's see here.	12 13 14 15	said: "A number of plaintiffs' experts, including Dr. Crowley, take the position that it would be it would suffice to establish that talcum powder or its alleged constituents are carcinogenic because any exposure to a carcinogen can cause
12 13 14 15 16	cause cancer are not consistent with generally accepted methods used by toxicologists to analyze and assess risk to human health." And then under that let's see here. Make sure I'm in the right place. Okay. Sorry.	12 13 14 15 16	said: "A number of plaintiffs' experts, including Dr. Crowley, take the position that it would be it would suffice to establish that talcum powder or its alleged constituents are carcinogenic because any exposure to a carcinogen can cause cancer, but this position lacks scientific
12 13 14 15 16 17	cause cancer are not consistent with generally accepted methods used by toxicologists to analyze and assess risk to human health." And then under that let's see here. Make sure I'm in the right place. Okay. Sorry. "A number of plaintiffs' experts,	12 13 14 15 16 17	said: "A number of plaintiffs' experts, including Dr. Crowley, take the position that it would be it would suffice to establish that talcum powder or its alleged constituents are carcinogenic because any exposure to a carcinogen can cause cancer, but this position lacks scientific support. Carcinogens exist everywhere."
12 13 14 15 16 17 18	cause cancer are not consistent with generally accepted methods used by toxicologists to analyze and assess risk to human health." And then under that let's see here. Make sure I'm in the right place. Okay. Sorry. "A number of plaintiffs' experts, including Dr. Crowley, take the position that it	12 13 14 15 16 17 18	said: "A number of plaintiffs' experts, including Dr. Crowley, take the position that it would be it would suffice to establish that talcum powder or its alleged constituents are carcinogenic because any exposure to a carcinogen can cause cancer, but this position lacks scientific support. Carcinogens exist everywhere." Right? That's what you said. Yes, you
12 13 14 15 16 17 18	cause cancer are not consistent with generally accepted methods used by toxicologists to analyze and assess risk to human health." And then under that let's see here. Make sure I'm in the right place. Okay. Sorry. "A number of plaintiffs' experts, including Dr. Crowley, take the position that it would suffice to establish that talcum powder or	12 13 14 15 16 17 18 19	said: "A number of plaintiffs' experts, including Dr. Crowley, take the position that it would be it would suffice to establish that talcum powder or its alleged constituents are carcinogenic because any exposure to a carcinogen can cause cancer, but this position lacks scientific support. Carcinogens exist everywhere." Right? That's what you said. Yes, you said that?
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12 13 14 15 16 17 18 19 20 21	cause cancer are not consistent with generally accepted methods used by toxicologists to analyze and assess risk to human health." And then under that let's see here. Make sure I'm in the right place. Okay. Sorry. "A number of plaintiffs' experts, including Dr. Crowley, take the position that it would suffice to establish that talcum powder or its alleged constituents are carcinogenic because any exposure to a carcinogen can cause cancer, but	12 13 14 15 16 17 18 19 20 21	said: "A number of plaintiffs' experts, including Dr. Crowley, take the position that it would be it would suffice to establish that talcum powder or its alleged constituents are carcinogenic because any exposure to a carcinogen can cause cancer, but this position lacks scientific support. Carcinogens exist everywhere." Right? That's what you said. Yes, you said that? MR. LOCKE: Objection. THE WITNESS: So I I'm not clear if
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	Page 294		Page 296
1	read from your report.	1	carcinogenicity of these products."
2	A I know, but you started by saying	2	Did I read that correctly?
3	something else. That's why I was trying to read	3	A Yes, you did read that correctly.
4	the monitor.	4	(Counsel conferring.)
5	Q Okay. All right. Well, suffice to	5	BY MR. MEADOWS:
6	let's read this again. I want to make sure we're	6	Q Okay. I'm being told we need to mark
7	on the same page.	7	we need to mark this. So let's mark it as
8	A Okay.	8	Exhibit 17.
9	Q You say in your report, it's up on the	9	(Moore Exhibit No. 17 was marked
10	screen: "A number of plaintiffs' experts,	10	for identification.)
11	including Dr. Crowley, take the position that it	11	BY MR. MEADOWS:
12	would suffice to establish that talcum powder or	12	Q There you go. And that's Dr. Crowley's
13	its alleged constituents are carcinogenic because	13	report.
14	any exposure to a carcinogen can cause cancer, but	14	A Thank you.
15	this position lacks scientific support.	15	Q We're going to get this question and
16	Carcinogens exist everywhere."	16	exchange off the ground here shortly. It's a long
17	You said that, correct?	17	taxi, but we're getting there.
18	A You read that correctly, yes.	18	Okay. So Dr. Crowley actually says:
19	Q Okay. Actually, I want to go I want	19	"Accordingly, in my opinion, the fragrance
20	to go to what Dr. Crowley actually says in his	20	chemicals in the Johnson & Johnson talcum powder
21	report.	21	products contribute to the inflammatory
22	A Can I have a copy, please?	22	properties, toxicity, and potential
23	Q Well, it's up there on the screen.	23	carcinogenicity of these products."
24	MR. ZELLERS: Well, she needs a copy if	24	Did I read that correctly?
25	she's going to address questions.	25	A You did read that correctly.
	Page 295		Page 297
1	MR. MEADOWS: Can we have his report?	1	Q So do you disagree with Dr. Crowley's
2	BY MR. MEADOWS:	2	opinion that the fragrance chemicals added to the
3	Q Looky there, we killed a tree for you.	3	powder can contribute to the inflammatory
4	A Thank you.	4	properties?
5	MR. ZELLERS: And I'm sorry, do you have	5	MR. ZELLERS: Objection. Form.
6	another or you don't want to take them all back	6	THE WITNESS: So I think can you just
7	anyway. Thank you.	7	restate that question one more time?
8	THE WITNESS: Do you have to put a	8	BY MR. MEADOWS:
9	number on this one or	9	Q Yeah. My question is, do you disagree
10	MS. TUCKER: No. That's okay.	10	with Dr. Crowley's opinion that the fragrance
11	THE WITNESS: Okay.	11	chemicals added to the powder could contribute to
12	BY MR. MEADOWS:	12	the inflammatory properties of the powder?
13	Q All right. So we're on page 65 of	13	MR. ZELLERS: Objection. Form.
14	Dr. Crowley's report.	14	THE WITNESS: So that question assumes
15	It says: "Accordingly"	15	that there are inflammatory properties of the
	MR. ZELLERS: Hold on. Hold on.	16	powder.
16			DIVIND A TEADONIC
17	THE WITNESS: Hold on a second. I want	17	BY MR. MEADOWS:
17 18	to get there.	18	Q Okay. So you disagree with
17 18 19	to get there. All right.	18 19	Q Okay. So you disagree with Dr. Crowley's statement, I assume because you
17 18 19 20	to get there. All right. BY MR. MEADOWS:	18 19 20	Q Okay. So you disagree with Dr. Crowley's statement, I assume because you don't think that there are any inflammatory
17 18 19 20 21	to get there. All right. BY MR. MEADOWS: Q There?	18 19 20 21	Q Okay. So you disagree with Dr. Crowley's statement, I assume because you don't think that there are any inflammatory properties; is that right?
17 18 19 20 21 22	to get there. All right. BY MR. MEADOWS: Q There? "Accordingly, in my opinion, the	18 19 20 21 22	Q Okay. So you disagree with Dr. Crowley's statement, I assume because you don't think that there are any inflammatory properties; is that right? MR. ZELLERS: Objection. Form.
17 18 19 20 21 22 23	to get there. All right. BY MR. MEADOWS: Q There? "Accordingly, in my opinion, the fragrance chemicals in the Johnson & Johnson	18 19 20 21 22 23	Q Okay. So you disagree with Dr. Crowley's statement, I assume because you don't think that there are any inflammatory properties; is that right? MR. ZELLERS: Objection. Form. THE WITNESS: So I think that it's
17 18 19 20 21 22	to get there. All right. BY MR. MEADOWS: Q There? "Accordingly, in my opinion, the	18 19 20 21 22	Q Okay. So you disagree with Dr. Crowley's statement, I assume because you don't think that there are any inflammatory properties; is that right? MR. ZELLERS: Objection. Form.

toxicities. BY MR. MEADOWS: Q Okay. You think that Dr. Crowley	1 2	not? A Okay. So I guess I'm confused with the
BY MR. MEADOWS:		A Okay. So I guess I'm confused with the
	l _	, .
	3	state the statements that you're having me
disagrees with that?	4	agree or disagree to. I thought we were just
MR. ZELLERS: Form, foundation	5	discussing the skin
	6	Q Yeah, and I let's try this again,
-	7	because I I feel like my question is pretty
BY MR. MEADOWS:	8	simple, but I feel like you're taking me to
O And I don't understand your response. I	9	something else that has to do with dose. I hadn't
	10	asked you anything about dose.
	11	So my question is, do you disagree with
	12	Dr. Crowley's opinion that fragrance chemicals
-	13	added to the powder could contribute to the
	14	inflammatory properties of the powder?
	15	MR. ZELLERS: Objection. Form, asked
		and answered.
- · · · · · · · · · · · · · · · · · · ·	17	THE WITNESS: Again, that statement has
-		to incorporate dose in order to evaluate it.
		BY MR. MEADOWS:
		Q Well, are you aware that, irre
		irrespective of what CIR says because I know
	l	you're getting hung up on the case-control thing
C C		that's in that paragraph irrespective of that,
		are you aware of the fact that it is not
		recommended that baby powder be used on open skin
1112 W111 (255) 55 cm; you 100m; umo		recommended that baby powder be used on open skin
Page 299		Page 301
BY MR. MEADOWS:	1	or a wound?
Q Well, what do you assume or not assume	2	MR. ZELLERS: Objection.
regarding the inflammatory properties of of	3	BY MR. MEADOWS:
baby powder?	4	Q Are you aware of that?
MR. ZELLERS: Same objection.	5	MR. ZELLERS: Form, foundation.
THE WITNESS: So I've evaluated the	6	THE WITNESS: You'd have to show me that
literature in this regard, and at high enough	7	document, and I can evaluate that.
doses, you get a foreign body reaction to the	8	(Counsel conferring.)
talcum powder.	9	(Moore Exhibit No. 18 was marked
BY MR. MEADOWS:	10	for identification.)
Q Okay. And we know that powder that	11	BY MR. MEADOWS:
baby powder should not be on open used on an	12	Q Let me show you what I marked as
open open skin or a wound, right?	13	Exhibit 18.
MR. ZELLERS: Objection. Form,	14	Are you familiar with the the baby
foundation, asked and answered.	15	powder bottle?
THE WITNESS: Again, I'd have to	16	A In general, that's in the baby powder
evaluate those the the article, the sentence	17	bottle.
that we the one sentence that we evaluated	18	Q Well, did you look at the baby powder
attributed that statement to case case reports,	19	bottle at all when you were preparing your report?
and I would have to evaluate those case reports to	20	A So again, my task here was to evaluate
understand what the dose was in that setting.	21	the scientific evidence and the dataset that
	1	
BY MR. MEADOWS:	22	exists between perineal use of talc, use of talc
BY MR. MEADOWS:	22 23	exists between perineal use of talc, use of talc and development of ovarian cancer.
-	1	=
	Q And I don't understand your response. I mean, I just simply asked you if you disagreed with Dr. Crowley's opinion that the fragrance chemicals added to the powder could contribute to the inflammatory properties of of the powder. So what's your answer to that? MR. ZELLERS: Objection. Form. THE WITNESS: So again, my answer to that is you have to understand dose as well assume that there is inflammatory properties to contribute to. BY MR. MEADOWS: Q Okay. So what do you what do you assume are not assumed with regard to the inflammatory properties? MR. ZELLERS: Objection. Form, vague. THE WITNESS: So can you restate that? Page 299 BY MR. MEADOWS: Q Well, what do you assume or not assume regarding the inflammatory properties of of baby powder? MR. ZELLERS: Same objection. THE WITNESS: So I've evaluated the literature in this regard, and at high enough doses, you get a foreign body reaction to the talcum powder. BY MR. MEADOWS: Q Okay. And we know that powder that baby powder should not be on open used on an open open skin or a wound, right? MR. ZELLERS: Objection. Form, foundation, asked and answered. THE WITNESS: Again, I'd have to evaluate those the the article, the sentence that we the one sentence that we evaluated attributed that statement to case case reports,	THE WITNESS: I don't understand what BY MR. MEADOWS: Q And I don't understand your response. I mean, I just simply asked you if you disagreed with Dr. Crowley's opinion that the fragrance chemicals added to the powder could contribute to the inflammatory properties of of the powder. So what's your answer to that? MR. ZELLERS: Objection. Form. THE WITNESS: So again, my answer to that is you have to understand dose as well assume that there is inflammatory properties to contribute to. BY MR. MEADOWS: Q Okay. So what do you what do you assume are not assumed with regard to the inflammatory properties? MR. ZELLERS: Objection. Form, vague. THE WITNESS: So can you restate that? Page 299 BY MR. MEADOWS: Q Well, what do you assume or not assume regarding the inflammatory properties of of baby powder? MR. ZELLERS: Same objection. THE WITNESS: So I've evaluated the literature in this regard, and at high enough doses, you get a foreign body reaction to the talcum powder. BY MR. MEADOWS: Q Okay. And we know that powder that baby powder should not be on open used on an open open skin or a wound, right? MR. ZELLERS: Objection. Form, foundation, asked and answered. THE WITNESS: Again, I'd have to evaluate those the the article, the sentence that we the one sentence that we evaluated attributed that statement to case case reports,

	Page 302		Page 304
1	efforts to prepare your report? Either you did or	1	Q Okay. Well, I didn't ask you anything
2	you didn't. I'm just asking if you did.	2	about dose. I'm just asking you, were you aware
3	MR. LOCKE: Objection.	3	that children can have breathing problems from
4	THE WITNESS: So I evaluated the	4	inhaling baby powder?
5	scientific data that that was germane to my	5	MR. ZELLERS: Form, foundation
6	report. I there was I mean, I can't say if	6	objection.
7	I did or if I did not review specifically the baby	7	THE WITNESS: So
8	powder bottle in reference to this case.	8	BY MR. MEADOWS:
9	BY MR. MEADOWS:	9	Q Were you aware of it or not? I mean
10	Q Okay. Well, did you read all of	10	that's all I'm asking.
11	Dr. Plunkett's report?	11	MR. ZELLERS: Same objections. Give her
12	A It's been a long time. I read through	12	a chance to answer, please.
13	it. I don't know if I read every word or not.	13	THE WITNESS: I was aware that the
14	Q Did you read all of the materials that	14	hazard for inhalation of particles exists, yes.
15	Dr. Plunkett cited to in support of her report?	15	BY MR. MEADOWS:
16	A Are you talking about every reference	16	Q Next sentence
17	that she cited in her report?	17	A As long as there's enough dose, it's
18	Q Yeah.	18	treated as a hazard.
19	A I don't know if I read every one. I	19	Q Next sentence.
20	didn't go one by one. We can go one by one and	20	A A risk.
21	compare it to my list if you'd like.	21	Q "Avoid contact with eyes."
22	Q Did you read all of Dr. Crowley's	22	Why would that be significant?
23	report?	23	A So these are warning labels on on the
24	A I did read Dr. Crowley's report. I	24	label. I'm not a warnings expert. I don't know
25	don't know if I read every page of the references	25	what the what the rationale is for that label.
	Page 303		D 20E
			Page 305
1	and appendix and things, but sorry, of the	1	Q So in your studies of the potential ill
2	and appendix and things, but sorry, of the appendices. I didn't mean references.	2	Q So in your studies of the potential ill effects of baby powder, you haven't run across any
2	and appendix and things, but sorry, of the appendices. I didn't mean references. Q Exhibit 18 is a compilation of pictures	2	Q So in your studies of the potential ill effects of baby powder, you haven't run across any literature that might shed any light on why that
2 3 4	and appendix and things, but sorry, of the appendices. I didn't mean references. Q Exhibit 18 is a compilation of pictures of various body powders. The first one is baby	2 3 4	Q So in your studies of the potential ill effects of baby powder, you haven't run across any literature that might shed any light on why that warning would be on there?
2 3 4 5	and appendix and things, but sorry, of the appendices. I didn't mean references. Q Exhibit 18 is a compilation of pictures of various body powders. The first one is baby powder.	2 3 4 5	Q So in your studies of the potential ill effects of baby powder, you haven't run across any literature that might shed any light on why that warning would be on there? MR. ZELLERS: Hold on. Form, foundation
2 3 4 5 6	and appendix and things, but sorry, of the appendices. I didn't mean references. Q Exhibit 18 is a compilation of pictures of various body powders. The first one is baby powder. Were you aware before looking at this	2 3 4 5 6	Q So in your studies of the potential ill effects of baby powder, you haven't run across any literature that might shed any light on why that warning would be on there? MR. ZELLERS: Hold on. Form, foundation objection.
2 3 4 5 6 7	and appendix and things, but sorry, of the appendices. I didn't mean references. Q Exhibit 18 is a compilation of pictures of various body powders. The first one is baby powder. Were you aware before looking at this that the ingredients to baby powder are talc and	2 3 4 5 6 7	Q So in your studies of the potential ill effects of baby powder, you haven't run across any literature that might shed any light on why that warning would be on there? MR. ZELLERS: Hold on. Form, foundation objection. THE WITNESS: Yeah, I can speculate,
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Page 308 Page 306 1 on. They're preventative warnings or based on 1 and the scientific literature, to evaluate -- to 2 scientific data. I -- I would need the scientific 2 come to my conclusions that are spelled out in my 3 data to see why those labels were put on there. 3 report. 4 4 Otherwise, it would be pure speculation or guess, And I'm happy to discuss each one of 5 5 and that's not what I'm here today to do. those studies, and we can go through it as to why 6 BY MR. MEADOWS: 6 or why not it may apply to one of these warning 7 7 Q The next sentence says: "For external labels. But without knowledge of the criteria 8 8 that the manufacturer used in putting these use only." 9 Did I read that correctly? 9 warning labels on the bottle, it would be complete 10 10 speculation to guess. Q What would baby powder do if it was used 11 11 BY MR. MEADOWS: 12 12 Q Are you aware that there are other internally? 13 MR. ZELLERS: Objection. Form. 13 products on the market now that provide a warning Foundation. 14 regarding ovarian cancer? 14 THE WITNESS: Again, that's a pretty A No, I did not know that. 15 15 16 generic question. So specifically, where 16 Q Let's look at a couple of them. Next 17 internally? What is the dose internally? It's a 17 page. 18 lot of generalization in that question. 18 Angel of Mine Baby Powder. Are you 19 BY MR. MEADOWS: 19 familiar with that product? 20 Q Mm-hmm. Well, do you think that that 20 A No, I've never heard of it. admonition or that warning "For external use only" 21 21 Q If you go down here, it says: "This 22 has anything to do with the CIR comments about not 22 product contains talcum powder." 23 allowing baby powder to be used on an exposed 23 A Wait. Where are we? 2.4 24 Q Down here (indicating). dermal? 25 MR. ZELLERS: Objection to form. 25 A Oh, I see. Okay. Page 307 Page 309 1 BY MR. MEADOWS: Q It has a similar warning. "Keep out of 1 2 Q Or -- or an area --2 reach of children. For external use only. Avoid 3 MR. ZELLERS: Sorry. 3 contact with eyes. Discontinue use if irritation 4 BY MR. MEADOWS: 4 persists. Avoid ingestion or accidental 5 Q -- that does not have a dermal barrier? 5 inhalation by baby." MR. ZELLERS: Objection. Form. 6 6 This -- and then it says in bold: "This 7 7 Foundation. Speculation. product contains talcum powder and it is intended 8 THE WITNESS: So these are warnings that 8 for external use only. Frequent application of 9 the manufacturer put on based on a set of criteria 9 talcum powder in the female genital area may 10 that -- that we're not evaluating here today. I'd 10 increase the risk of ovarian cancer." 11 need to see those set of criteria and the 11 Did I read that correctly? 12 scientific data that support those decisions that 12 A I believe you read that correctly, yes. 13 were made to put those warning labels on the 13 Q Have you ever seen that before? 14 bottle. 14 A So I hadn't seen this product before, 15 BY MR. MEADOWS: 15 and I had not seen the label before. And I do not 16 Q Well, as a toxicologist, isn't it 16 know, again, what the criteria the manufacturer 17 important for you to understand potential toxicity 17 used in developing this warning label. 18 of -- of whatever you're studying at the time, 18 In my -- in my review of the scientific 19 19 regardless of -- of where it's applied and how dataset, scientific dataset does not support that 20 20 much it's applied? talcum powder use in the perineal region is a 21 MR. ZELLERS: Same objections. Form, 21 cause of ovarian cancer. 22 foundation. 22 Q The next one, next page is called 23 THE WITNESS: So I evaluated the 23 "Shower and Bath." And this one has a warning 24 scientific dataset for Johnson's Baby Powder and 24 that says: "This product contains talcum powder 25 25 Shower to Shower, the studies that are available and is intended for external use only. Frequent

	Page 310		Page 312
1	application of talcum powder in the female genital	1	nose and mouth. Medical evidence suggests that
2	area may increase the risk of ovarian cancer."	2	women who use talcum powder as a feminine hygiene
3	Do you see that?	3	product run a greater risk of developing ovarian
4	A Yes, you read that correctly from the	4	cancer."
5	label.	5	Did I read that correctly?
6	Q It's different from the Johnson's Baby	6	A You did read that statement correctly.
7	Powder labels, isn't it?	7	Q There's
8	A Well	8	A But this this statement is internally
9	MR. ZELLERS: Objection hold on.	9	inconsistent. So again, I have no idea, you know,
10	Objection. Form.	10	what was the rationale for the manufacturer to put
11	Go ahead.	11	on that statement.
12	THE WITNESS: Well, again, I do not know	12	Q And you said it earlier, you're not a
13	what the criteria was for the manufacturer to	13	regulatory expert, right? Not a warnings expert?
14	decide to put this label on the onto the powder	14	A I do not know the regulations regarding
15	bottle.	15	the warnings, but what I can say is and I
16	What I can say is the scientific dataset	16	definitely don't know what what criteria they
17	does not support that there's a causal association	17	used for this cautionary statement that's on here.
18	or that perineal use of ovarian sorry. I can	18	Q Mm-hmm.
19	say that scientific the scientific dataset does	19	A You know, they say, "For adult use
20	not support a causal relationship between the	20	only," and then they include, "Keep powder away
21	perineal use of talc, talcum products, and the	21	from children's nose and mouth," like so,
22	development of ovarian cancer.	22	again, I don't know what the review process was,
23	BY MR. MEADOWS:	23	what the scientific dataset was that they used to
24	Q If you go down on this under	24	make up that caution statement or that they added
25	"Ingredients," it talks about ingredients being	25	to that label.
	Page 311		Page 313
1	Page 311 this one has talc and cornstarch.	1	
1 2	this one has talc and cornstarch.	1 2	Page 313 Q Now, to make sure I'm clear, I know you have not offered opinions as a regulatory expert
		1	Q Now, to make sure I'm clear, I know you
2	this one has talc and cornstarch. Were you aware that some body powders contain cornstarch?	2	Q Now, to make sure I'm clear, I know you have not offered opinions as a regulatory expert in this case, but I want to make sure I have an
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	this one has talc and cornstarch. Were you aware that some body powders contain cornstarch? A Yes, some body I was aware that some body powders contain cornstarch. Q And have you looked at the carcinogenicity capacity for cornstarch? A So what I said is I evaluated the scientific dataset for Johnson's Baby Powder and Shower to Shower. Q Okay. Well, I understand that's what you evaluated for your report. I'm asking you if you've ever looked at the carcinogenicity for cornstarch. A I have not done a comprehensive literature review or assessment of cornstarch. Q Then there's one more here, I think. I think the last one here is a foot powder. One more body powder on here. Next page. This is Spring Fresh Poudre Talco. And it's it's got talc in it. And a caution down here. "For adult use only. Keep out	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q Now, to make sure I'm clear, I know you have not offered opinions as a regulatory expert in this case, but I want to make sure I have an understanding. Do you have you didn't claim expertise in in regulatory matters earlier. Do you have expertise in regulatory matters? A So that's a pretty broad term. Q Cosmetics. Do you have expertise in the regulation of cosmetics? A Just in in the realm of a toxicologist. Q But you don't know anything about when a warning is triggered a warning requirement is triggered in the cosmetic context? MR. ZELLERS: Form, foundation objection. THE WITNESS: So, no, I wouldn't know that. BY MR. MEADOWS: Q Okay. Going back to Dr. Crowley's
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	Page 314		Page 316
1	THE WITNESS: Could you just state that	1	toxicological principle.
2	again in a different manner?	2	A Okay.
3	BY MR. MEADOWS:	3	Q Applying general principles of
4	Q Yeah. Do you disagree with	4	toxicology, is it acceptable or a good practice to
5	Dr. Crowley's opinion that the fragrance chemicals	5	add fragrance chemicals to baby powder that do not
6	added to the powder could contribute to the	6	have an established governmental or industry
7	toxicity of the powder?	7	standard?
8	MR. ZELLERS: Same objection.	8	MR. ZELLERS: Objection. Form.
9	THE WITNESS: So Dr. Crowley's	9	Foundation.
10	methodology that he used to assess the fragrance	10	THE WITNESS: So the reason I'm having
11	ingredients did not assess dose, and that is a	11	problems with that statement is the the way
12	critical component in any toxicological	12	that Dr. Crowley identified the industrial
13	assessment. So I disagree with the methods that	13	standards that he applied in his report were
14	he used in a in reaching any conclusions.	14	flawed.
15	BY MR. MEADOWS:	15	BY MR. MEADOWS:
16	Q Do you disagree with Dr. Crowley's	16	Q Applying general excuse me
17	opinion that the fragrance chemicals added to the	17	applying general principles of toxicology, is it
18	powder could contribute to the potential	18	acceptable or a good practice to add a substance
19	carcinogenicity of the powder?	19	to baby powder that is prohibited as a fragrance
20	MR. ZELLERS: Object to form.	20	chemical and is not permitted for use on the body?
21	THE WITNESS: So again, I said what I	21	MR. ZELLERS: Objection. Form.
22	disagreed with what I disagree with Dr. Crowley	22	Foundation.
23	is the methodology that he used to generate his	23	THE WITNESS: Well, again, if we look
24	opinions that because he did not assess dose in	24	at can we look at my report for the fragrance
25	any of his opinions, in any of his methods that he	25	that Dr. Crowley references that's prohibited?
	Page 315		Page 317
1	used to generate his opinions, and so his methods	1	Because he was actually incorrect in his methods
2	were flawed.	2	to evaluate the fragrance chemicals.
3	BY MR. MEADOWS:	3	BY MR. MEADOWS:
4	Q Applying general principles of	4	Q Well, mine is just a general principle
5	toxicolycology let me start again.	5	question.
6	Remember that cold I told you about earlier? It's	6	Applying general principles of
7	catching up to me.	7	toxicology, is it acceptable or a good practice to
8	Applying general principles of	8	add a substance to baby powder that is prohibited
9	toxicology, is it acceptable and a good practice	9	as a fragrance chemical and is not permitted for
10	to add fragrance chemicals to baby powder that do	10	use in the body?
11	not have an established governmental or industry	11	MR. ZELLERS: Objection. Form,
12	standard?	12	foundation, asked and answered.
13	MR. ZELLERS: Objection. Form,	13	THE WITNESS: Again, we'd have to
14	foundation.	14	Dr. Crowley's his the entire reason he
		15	generated that statement was because he identified
15	THE WITNESS: So I guess I don't	1 13	_
	understand which which bullet point are you	16	a chemical using flawed methodology.
15	understand which which bullet point are you now referencing?		a chemical using flawed methodology. BY MR. MEADOWS:
15 16	understand which which bullet point are you now referencing? BY MR. MEADOWS:	16	a chemical using flawed methodology. BY MR. MEADOWS: Q Applying general principles of
15 16 17	understand which which bullet point are you now referencing? BY MR. MEADOWS: Q I'm just talking about Dr. Crowley's	16 17	a chemical using flawed methodology. BY MR. MEADOWS: Q Applying general principles of toxicology, is it acceptable or a good practice to
15 16 17 18	understand which which bullet point are you now referencing? BY MR. MEADOWS: Q I'm just talking about Dr. Crowley's opinions, generally.	16 17 18	a chemical using flawed methodology. BY MR. MEADOWS: Q Applying general principles of toxicology, is it acceptable or a good practice to add a substance to baby powder that is not
15 16 17 18 19	understand which which bullet point are you now referencing? BY MR. MEADOWS: Q I'm just talking about Dr. Crowley's	16 17 18 19 20 21	a chemical using flawed methodology. BY MR. MEADOWS: Q Applying general principles of toxicology, is it acceptable or a good practice to add a substance to baby powder that is not permitted for fragrance or flavor use?
15 16 17 18 19 20	understand which which bullet point are you now referencing? BY MR. MEADOWS: Q I'm just talking about Dr. Crowley's opinions, generally. A Generally? Q Yeah.	16 17 18 19 20	a chemical using flawed methodology. BY MR. MEADOWS: Q Applying general principles of toxicology, is it acceptable or a good practice to add a substance to baby powder that is not
15 16 17 18 19 20 21	understand which which bullet point are you now referencing? BY MR. MEADOWS: Q I'm just talking about Dr. Crowley's opinions, generally. A Generally? Q Yeah. A So generally, I think we need to look	16 17 18 19 20 21	a chemical using flawed methodology. BY MR. MEADOWS: Q Applying general principles of toxicology, is it acceptable or a good practice to add a substance to baby powder that is not permitted for fragrance or flavor use? MR. ZELLERS: Objection. Form, foundation.
15 16 17 18 19 20 21 22	understand which which bullet point are you now referencing? BY MR. MEADOWS: Q I'm just talking about Dr. Crowley's opinions, generally. A Generally? Q Yeah.	16 17 18 19 20 21 22	a chemical using flawed methodology. BY MR. MEADOWS: Q Applying general principles of toxicology, is it acceptable or a good practice to add a substance to baby powder that is not permitted for fragrance or flavor use? MR. ZELLERS: Objection. Form,

	Page 320
2 BY MR. MEADOWS: 2 evaluate each chemical	: Again, I would have to
3 O Applying general principles of 3 esoteric question so	independently. This is a
Applying general principles of Sesotetic question, so	
4 toxicology, is it acceptable or a good practice to 4 BY MR. MEADOWS:	
5 add a substance to baby powder that is not 5 Q What was flawer	ed about his methodology
6 permitted for cosmetic use by the FDA? 6 with respect to these qu	estions?
7 MR. ZELLERS: Objection. Form. 7 A So he well, w	e can go through his
8 Foundation. 8 report.	
9 THE WITNESS: Again, the substance that 9 Q Well, if you wa	nt to look and tell me,
10 we're speaking of was identified by Dr. Crowley 10 if looking at your report	t will refresh your
11 using scientifically flawed methodology. 11 recollection about what	was flawed about his
12 BY MR. MEADOWS: 12 methodology with respec	ect to adding these
	der, then go right ahead.
	Objection. Form. Asked
add a substance to baby powder that is not a 15 and answered.	-
16 fragrance, does not have an IFR standard, and is 16 BY MR. MEADOWS:	
	insinuating that he was
	cal in his methodology. But
19 Foundation. 19 maybe I'm wrong in my	
20 THE WITNESS: So you'd have to evaluate 20 A (Peruses docum	_
21 each substance independently. And again, you 21 Q Go ahead.	
	on pereirae, the Balsam
when he identified many substances that he 23 Peru oil, on page 79 of 1	_
24 characterized and I'm sorry, I don't know what 24 criticism.	
25 the IFR standard is. 25 Q Okay.	
Page 319	Page 321
1 BY MR. MEADOWS: 1 A So he ascertain	s that this it's
2 Q You're not familiar with the IFR 2 called Balsam Peru oil,	if that's along is
3 standard IFRA standard, you're not familiar 3 prohibited by the Interr	
3 standard IFRA standard, you're not familiar 3 prohibited by the Interr 4 A The IFR the IFRA standard, yeah. 4 Association for use as a	national Fragrance
	national Fragrance a fragrance ingredient.
4 A The IFR the IFRA standard, yeah. 4 Association for use as a 5 Q You're not you're not familiar 5 And so that was incorred.	national Fragrance a fragrance ingredient.
4 A The IFR the IFRA standard, yeah. 4 Association for use as a 5 Q You're not you're not familiar 5 And so that was incorred	national Fragrance a fragrance ingredient. ect. failed to recognize
4 A The IFR the IFRA standard, yeah. 5 Q You're not you're not familiar 5 And so that was incorred 6 A Sorry, I am. 6 In his search, he	national Fragrance a fragrance ingredient. ect. failed to recognize ere were actually two
4 A The IFR the IFRA standard, yeah. 5 Q You're not you're not familiar 5 And so that was incorred 6 A Sorry, I am. 6 In his search, he 7 Q You are familiar. 7 the difference that the	national Fragrance a fragrance ingredient. ect. failed to recognize ere were actually two extractor distillates in
4 A The IFR the IFRA standard, yeah. 5 Q You're not you're not familiar 5 And so that was incorred 6 A Sorry, I am. 6 In his search, he 7 Q You are familiar. 7 the difference that the 8 A I am familiar with so you're talking 8 different Balsam Peruse	national Fragrance a fragrance ingredient. ect. failed to recognize ere were actually two extractor distillates in
4 A The IFR the IFRA standard, yeah. 5 Q You're not you're not familiar 5 And so that was incorre 6 A Sorry, I am. 6 In his search, he 7 Q You are familiar. 7 the difference that the 8 A I am familiar with so you're talking 9 about the International Fragrance Association 9 in this, and that they sh 10 standards? That can we spell out the acronym, 10 number.	national Fragrance a fragrance ingredient. ect. failed to recognize ere were actually two extractor distillates in
4 A The IFR the IFRA standard, yeah. 5 Q You're not you're not familiar 5 And so that was incorred 6 A Sorry, I am. 6 In his search, he 7 Q You are familiar. 7 the difference that the 8 A I am familiar with so you're talking 9 about the International Fragrance Association 9 in this, and that they sh 10 standards? That can we spell out the acronym, 10 number. 11 please? 11 So that's what I was not as a sacciation 10 Association 10 In this search, he 11 So that's what I was number.	national Fragrance a fragrance ingredient. ect. failed to recognize ere were actually two extractor distillates in ared the same cast
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4 A The IFR the IFRA standard, yeah. 5 Q You're not you're not familiar 6 A Sorry, I am. 6 In his search, he 7 Q You are familiar. 8 A I am familiar with so you're talking 9 about the International Fragrance Association 10 standards? That can we spell out the acronym, 11 please? 12 Q Sure. Is that what it is? 13 A Is that I'm asking you. 4 Association for use as a And so that was incorrect for use as a And so that was incorre	national Fragrance a fragrance ingredient. ect. failed to recognize ere were actually two extractor distillates in ared the same cast was describing earlier oited substance involvement
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4 A The IFR the IFRA standard, yeah. 5 Q You're not you're not familiar 6 A Sorry, I am. 6 In his search, he 7 Q You are familiar. 7 the difference that the 8 A I am familiar with so you're talking 9 about the International Fragrance Association 10 standards? That can we spell out the acronym, 11 please? 12 Q Sure. Is that what it is? 13 A Is that I'm asking you. 14 Q Yeah. 15 MR. ZELLERS: Objection. Vague. 4 Association for use as a Association for use as a And so that was incorrect. 5 And so that was incorrect. 6 In his search, he 7 the difference that the differen	national Fragrance a fragrance ingredient. ect. failed to recognize ere were actually two extractor distillates in ared the same cast was describing earlier bited substance involvement ided to the fragrance it to Johnson & Johnson.
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2 chemicals other than the Balsam Peru oil that he got wrong? 4 A Well, his 5 MR. ZFLLERS: Objection. Form. 6 THE WITNESS: So let me just find 7 so in his so in his report, he identified concerns in the the baby powder, and then ones without it were were not included. So he concerns in the the baby powder, and then ones without it were were not included. So he concerns in the the baby powder, and then ones without it were were not included. So he concerns in the the baby powder, and then ones without it were were not included. So he concerns in the the baby powder, and then ones without it were were not included. So he concerns in the the baby powder, and then ones without it were were not included. So he concerns in the the baby powder, and then ones without it were were not included. So he concerns in the the baby powder, and then ones without it were were not included. So he concerns in the the baby powder, and then ones without it were were not included. So he concerns in his so in his report. I will be a concerns in the the baby powder, and then ones to a proceed the current of the frequency of application and/or duration of those practices, application and/or duration of those practices. 4 application and/or duration of those practices. 4 application and/or duration of those practices. 5 application and/or duration of those practices. 5 application and/or duration of the expouncy of application oner duration of the an total number of application oner durations or time." 5 application and/or duration of those practices, application oner duration of those practices, application oner duration of the atomatic of application oner duration of the separation of the separation of the substitute. Specifically release to the simply multiplying to reach a total number of application of other duration with the wrote correctly. 5 A Leould do that the wrote correctly. 6 De MR, MEADOWS: 9 Qokay, So page 83 of your report, you say: the substi	1	Q But my question is, were there other	1	It is also difficult to exactly estimate the
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	Page 326		Page 328
1	than one minute here.	1	ascertain the maximum percentage of each fragrance
2	BY MR. MEADOWS:	2	ingredient in the formulated baby powder and
3	Q So I want to go back to Exhibit 2, which	3	Shower to Shower products.
4	we identified this morning.	4	Q And where did all this data come from?
5	A What was the name of that document?	5	A So the first column and the second
6	Q It's it's actually the e-mail that we	6	column were from Exhibits 1, 2 and 3, "For
7	got at 7 o'clock last night with your materials.	7	attorneys eyes only." That's the only way that
8	MR. ZELLERS: Okay. I have a copy if	8	they were labeled when we received them. That's
9	you need it, so let's	9	consistent with what Dr. Crowley had in his
10	THE WITNESS: Okay. Mine may be out of	10	report, Exhibits 1, 2 and 3.
11	order.	11	And then so your question was how do
12	MR. ZELLERS: Let's just see what his	12	we get to these? Sorry, I got lost.
13	question is.	13	Q Yeah, well
14	THE WITNESS: Okay. Or is out of order.	14	MR. ZELLERS: What is the purpose of
15	BY MR. MEADOWS:	15	this document was the question.
16	Q Okay. So I want to flip over to this	16	BY MR. MEADOWS:
17	page up here	17	Q Well, I was asking where the data came
18	A I think I can find that in here.	18	from. I think.
19	MR. ZELLERS: Do you see which page he	19	A Okay. Sorry.
20	is asking you about?	20	So that's where those first two columns
21	THE WITNESS: I see generally, yeah,	21	came from. The 0.22 was derived from
22	this document, right.	22	specification sheets and formulation sheets that
23	BY MR. MEADOWS:	23	we that we received that we asked for and
24	Q It's entitled "Fragrance Ingredient"	24	received, as well as in the materials that we
25	A Yeah, I have it.	25	received from Dr. Crowley's list of cited
	Page 327		Page 329
1	Q "Concentrations: Baby Powder."	1	materials. And then so 25 percent times 0.22
2	A I'm trying to find find the first	2	percent in the final product is 0.055. That's the
3	page. Sorry.	3	product is the percentage.
4	Okay, I'm with you.	4	Q Did you prepare this chart?
5	Q Okay. So what is this?	5	A I did.
6	A So this is a list of the fragrance	6	Q When?
7	ingredients from the Exhibit 1, 2 and 3 that	7	A So this chart was prepared when I
8	that's listed in my report, the "Attorneys' eyes	8	prepared my report, and then last week or I
9	only" document.	9	forget the exact day, I added this formula
		1	
10	And then we used the percent so so	10	calculation, because the notice said we had to
10 11		10 11	
	And then we used the percent so so		calculation, because the notice said we had to
11	And then we used the percent so so that's the first column and the second column.	11	calculation, because the notice said we had to have the formulas included in our calculations.
11 12	And then we used the percent so so that's the first column and the second column. Then we used the the maximum percentage this	11 12	calculation, because the notice said we had to have the formulas included in our calculations. Q And did you rely excuse me did you
11 12 13	And then we used the percent so so that's the first column and the second column. Then we used the the maximum percentage this first page is for baby powder, and so we used the	11 12 13	calculation, because the notice said we had to have the formulas included in our calculations. Q And did you rely excuse me did you rely on the data in this table in reaching your
11 12 13 14	And then we used the percent so so that's the first column and the second column. Then we used the the maximum percentage this first page is for baby powder, and so we used the maximum percentage that fragrance was in the baby	11 12 13 14	calculation, because the notice said we had to have the formulas included in our calculations. Q And did you rely excuse me did you rely on the data in this table in reaching your opinions that are expressed in this report?
11 12 13 14 15	And then we used the percent so so that's the first column and the second column. Then we used the the maximum percentage this first page is for baby powder, and so we used the maximum percentage that fragrance was in the baby powder, which was 0.22 in the records, to and	11 12 13 14 15	calculation, because the notice said we had to have the formulas included in our calculations. Q And did you rely excuse me did you rely on the data in this table in reaching your opinions that are expressed in this report? A So these this dataset was used to
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11 12 13 14 15 16 17	And then we used the percent so so that's the first column and the second column. Then we used the the maximum percentage this first page is for baby powder, and so we used the maximum percentage that fragrance was in the baby powder, which was 0.22 in the records, to and then we we in response to the notice for deposition, we included this formula column.	11 12 13 14 15 16 17	calculation, because the notice said we had to have the formulas included in our calculations. Q And did you rely excuse me did you rely on the data in this table in reaching your opinions that are expressed in this report? A So these this dataset was used to evaluate the concentrations compared to the IFRA standards.
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11 12 13 14 15 16 17 18 19 20 21 22	And then we used the percent so so that's the first column and the second column. Then we used the the maximum percentage this first page is for baby powder, and so we used the maximum percentage that fragrance was in the baby powder, which was 0.22 in the records, to and then we we in response to the notice for deposition, we included this formula column. And then to show you how we derived this last column, which was the maximum that the ingredient on that row was calculated to be in the product, and in this case, the product is the baby powder, as referenced at the top of this page.	11 12 13 14 15 16 17 18 19 20 21	calculation, because the notice said we had to have the formulas included in our calculations. Q And did you rely excuse me did you rely on the data in this table in reaching your opinions that are expressed in this report? A So these this dataset was used to evaluate the concentrations compared to the IFRA standards. Q Yeah, my question is, did you rely on the data in this table in reaching your opinions? A Well, we compared those to the IFRA standards to evaluate the concentrations. Q Well, I'm what do you mean by "we"?

Page 330 Page 332 1 A I was -- I was thinking of the team 1 A So again, the data in this table was 2 that helped review my document, the citation 2 used to evaluate each -- the status of ingredients 3 checks. 3 against -- and it's written in my report, the 4 4 Q All right. So one more time. Did you number of ingredients with IFRA transparency list 5 5 rely on the data in the table in reaching your status and with RIFM reviews, and we also 6 6 discussed the IFRA standards. 7 7 A Again, I don't know how to answer the So this was a worksheet that we used. 8 question. We used that -- this data to compare it 8 but all the opinions are in the report that are 9 to the concentrations that were in the IFRA 9 represented in this table. 10 10 BY MR. MEADOWS: standards. 11 Q Flip on over --11 Q All right. This is entitled "Review of 12 12 MS. SHARKO: I'll just note for the Metal Analysis Exhibits Cited in the Report of 13 record that that exhibit has "Attorneys' eyes 13 Mark Krekeler." 14 14 only" on it, so it shouldn't be circulated Did I read that correctly? A Yes, I believe so. 15 probably and should be treated appropriately 15 16 under the order. That is, it shouldn't be 16 Q So what is this? 17 17 circulated. A So this was a summary that was -- of the 18 MR. ZELLERS: So those are --18 information regarding metal analyses that was in 19 MR. MEADOWS: I couldn't hear you. You 19 the documents that we received -- let me see what 20 20 the -- I want to be precise here, what the name trailed off on me. 21 They shouldn't be circulated what? 21 of -- so we received another -- a number of 22 MS. SHARKO: Several of the attachments 22 documents that were the "Krekeler documents cited 23 to that last exhibit are marked "Attorneys' eyes 23 in the report - Johnson & Johnson," and the 24 24 only," so it needs to be treated with a higher "Krekeler documents cited in the report -25 25 level of protection. Exhibit 2. Imervs." Page 331 Page 333 1 BY MR. MEADOWS: 1 And so we wanted to -- or I wanted to 2 2 Q So what is this chart that we're looking understand what -- what types of analyses existed 3 at here? 3 in that -- in those -- in the volumes of data that 4 A So this is similar to the other 4 were supplied in those two groupings that I just 5 5 document. It had the fragrance ingredient names 6 6 And so -- so this is a summary of the on the left. And then this is a compilation of 7 7 whether or not each ingredient was on the IFRA analyses for chromium, cobalt and nickel that 8 8 could be gleaned from that dataset. transparency list. 9 And then part of our data review was to 9 (Counsel conferring.) 10 evaluate each ingredient as to whether or not it 10 MS. O'DELL: Why don't we go off the 11 had a RIFM review. And I captured that 11 record. 12 12 information on -- in this, I guess, second or THE VIDEOGRAPHER: The time is 6:05 p.m. 13 13 third column, however you count the columns. We're going off the record. 14 And then for each ingredient name, was 14 (Pause.) THE VIDEOGRAPHER: The time is 6:06 p.m. 15 there an IFRA standard, the type of standard that 15 16 was included, and then the limit that was 16 We're back on the record. 17 specified in each IFRA standard. 17 MR. MEADOWS: All right. I think my 18 18 boss has something that we need to put on the And then these last two columns came 19 19 from the previous file that we were -- I was just record. 20 20 MS. O'DELL: No further questions at speaking of, which was the maximum percentage of 21 21 each ingredient within baby powder or the Shower this time. 22 to Shower ingred- -- products. 22 As we noted at the beginning of the 23 Q Did you -- well, did you rely on 23 deposition, in light of the late production of 24 this data in the table to reach opinions in this 24 substantial analyses as well --25 25 THE REPORTER: I'm sorry? case?

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	Page 334		Page 336
1	MS. O'DELL: substantial analyses as	1	CERTIFICATE OF CERTIFIED SHORTHAND REPORTER
2	well as the additional reliance materials, which	2	The undersigned Certified Shorthand Reporter
3	were also quite significant, we will be discussing	3	does hereby certify:
4	additional time.	4	That the foregoing proceeding was taken before
5	Assuming that we can't reach agreement,	5	me at the time and place therein set forth, at
6	we will let Judge Pisano decide.	6	which time the witness was duly sworn; That the
7	MS. SHARKO: Okay. And we disagree with	7	testimony of the witness and all objections made
8	your characterization, and we will reply to it.	8	at the time of the examination were recorded
9	MR. ZELLERS: Before we adjourn, I have	9	stenographically by me and were thereafter
10	one question for Dr. Moore.	10	transcribed, said transcript being a true and
11	CROSS-EXAMINATION	11	correct copy of my shorthand notes thereof; That
12	BY MR. ZELLERS:	12	the dismantling of the original transcript will
L3	Q Dr. Moore, you were asked a number of	13	void the reporter's certificate.
L4	questions regarding asbestos, Johnson's Baby	14	In witness thereof, I have subscribed my name
L5	Powder and Shower to Shower.	15	this date: April 5, 2019.
L6	Do you stand by the statements in your	16	
.7	report?	17	
.8	A I do.	18	LESLIE A. TODD, CSR, RPR
.9	MR. ZELLERS: I have nothing else.	19	Certificate No. 5129
20	THE VIDEOGRAPHER: Okay.	20	(The foregoing certification of
21	MR. MEADOWS: All done.	21	this transcript does not apply to any
22	THE VIDEOGRAPHER: The time is 6:07 p.m.	22	reproduction of the same by any means,
23	on April 4, 2019.	23	unless under the direct control and/or
24	We're going off the record, completing	24	supervision of the certifying reporter.)
25	today's videotaped session.	25	. , ,
	Page 335		Page 337
1	(Whereupon, the deposition of	1	INSTRUCTIONS TO WITNESS
2	H. NADIA MOORE, Ph.D. was	2	Please read your deposition over carefully and
3			
	concinged at 6.07 p m)	3	
4	concluded at 6:07 p.m.)	3 4	make any necessary corrections. You should state
4 5	concluded at 6.07 p.m.)		make any necessary corrections. You should state the reason in the appropriate space on the errata
5	concluded at 6.07 p.m.)	4	make any necessary corrections. You should state the reason in the appropriate space on the errata sheet for any corrections that are made.
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5 6 7 8 9	concluded at 6.07 p.m.)	4 5 6 7	make any necessary corrections. You should state the reason in the appropriate space on the errata sheet for any corrections that are made. After doing so, please sign the errata sheet and date it. You are signing same subject to the changes you have noted on the errata sheet, which will be
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5 6 7 8 9 10 11	concluded at 6.07 p.m.)	4 5 6 7 8 9 10 11 12	make any necessary corrections. You should state the reason in the appropriate space on the errata sheet for any corrections that are made. After doing so, please sign the errata sheet and date it. You are signing same subject to the changes you have noted on the errata sheet, which will be attached to your deposition. It is imperative that you return the original errata sheet to the deposing attorney within thirty (30) days of
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